

2023 FIRST CONSULTATION

1 July – 30 September 2023

Compiled comments in English for 2023 First Consultation: 2020-001_Draft ISPM_PRA

Summary

Participants

Name	Summary
Barbados	Barbados supports this revision.
European Union	The comments on the draft standard are submitted by the European Commission on behalf of the European Union and its 27 Member States.
Fiji Σ	Comments consolidated in PPPO review document at PPPO meeting in Cook Islands
Gabon	document validé
Malawi	We support the reorganization and revision of PRA standards
Nigeria	The processes outlined in this standard are sufficient enough to have a comprehensive PRA
Rania ElHayek	pest risk must include seeds on commodities, cause there is a risk that they may accidentally spread with seeds
Singapore	Singapore is supportive of this draft standard.

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

S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (1800) Argentina (1 Oct 2023 4:19 AM) Argentina supports the COSAVE comments
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (1711) Mexico (29 Sep 2023 10:08 PM) Mexico has reviewed and supports the: Reorganization and revision of pest risk analysis standards (2020-001) and appreciate the work done on this document. It is suggested to evaluate the possibility of integrating Annex 4 on environmental risks to the central text and annexes 1, 2 and 3 where appropriate. The use of the term consequences without the qualifier is not shared. We suggest maintaining the use of terms related to potential economic

			importance as used in the current ISPM 11. Supplement 2 to ISPM 5 explains that all types of impacts are included in the term economic consequences. On the other hand, the expression is part of the definition of quarantine pest.
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE (1798) Barbados (30 Sep 2023 7:14 PM)</i></p> <p>Barbados supports the reorganization and revision of the standard. The fact that it seeks to harmonise the existing standards that speak to PRA is justifiable given that all elements of this important activity should be found in the same place.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL (1721) Costa Rica (30 Sep 2023 4:08 AM)</i></p> <p>La traducción más apropiada para "efectiveness" sería efectividad mantener el título de la NIMF 11 "Análisis de Riesgo de Plagas para Plagas Cuarentenarias" y mantener el número 11 para el documento final reorganizado Se sugiere evaluar la posibilidad de integrar el Anexo 4 sobre riesgos ambientales al texto central y a los anexos 1, 2 y 3 según corresponda</p> <p>Se consideran pertinente que el proyecto de norma de ARP incluya completo las etapas del ARP (los anexos 1 al 3) para hacer entendible y aplicable el proceso y separar del cuerpo de la norma los Anexos que comprenden del 4 al 6. El texto actual es poco entendible y extenso (impráctico) se considera que se pierde objetividad en el análisis de riesgo</p> <p>Revisar a detalle todo el cuerpo de la propuesta de norma a fin de actualizar los términos acorde a la NIMF 5</p> <p>No se comparte el uso del término consecuencias sin el calificativo. Sugerimos mantener el uso de términos relacionados con la importancia económica potencial tal como se usan en la NIMF 11 vigente. El</p>

			Suplemento 2 de la NIMF 5 explica que todos los tipos de impactos estan incluidos en el termino consecuencias económicas. Por otra parte la expresión es parte de la definición misma de plaga cuarentenaria.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (1712) Peru (29 Sep 2023 10:31 PM) Peru agrees with the comments agreed upon as COSAVE
G	(General Comment)	C	<i>Category : EDITORIAL</i> (1710) Paraguay (29 Sep 2023 8:56 PM) Paraguay de acuerdo con los comentarios de COSAVE.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (1708) Belarus (29 Sep 2023 4:07 PM) General comment: Republic of Belarus, would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System
G	(General Comment)	C	<i>Category : EDITORIAL</i> (1707) Switzerland (29 Sep 2023 1:28 PM) Switzerland would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (1678) Australia (29 Sep 2023 5:44 AM) When reviewing this document, Australia focussed on the core text and Annex 3 as this is the Annex containing the most new text. This document is currently too long to be fit for purpose as a standard. There are also a number of sections which, based on the colour coding, are not a priority for comment through this consultation round, though they would benefit from revision. A full review of this document, including streamlining the text and shortening the document will be beneficial to the revised PRA standard. Australia requests that the comments

			collected from this global commenting round be used as an input to a new EWG with a new Specification allowing them to revise the text for the purposes of clarity, streamlining and bringing the terminology of this very old document up to contemporary ISPM language. Australia is not comfortable with this document as it currently standards without further EWG revision with the ability to revise and make language more efficient and contemporary.
G	(General Comment)	C	Category : TECHNICAL (1677) Venezuela (28 Sep 2023 9:35 PM) Una observación en el apéndice:2. Aspectos comunes a todas las etapas del ARP, 2.1 Recopilación de información En el párrafo 2.Se propone que la información suministrada para el Análisis de Riesgo de Plagas, deberá ajustarse a un cuestionario emitido por el país solicitante donde especifique el ítem de interés.
G	(General Comment)	C	Category : EDITORIAL (1673) Lao People's Democratic Republic (28 Sep 2023 10:30 AM) General agree with the draft and the discussion during meeting was made
G	(General Comment)	C	Category : SUBSTANTIVE (1669) New Zealand (28 Sep 2023 9:00 AM) New Zealand supports the APPPC regional comments
G	(General Comment)	C	Category : EDITORIAL (1414) Malaysia (27 Sep 2023 3:03 AM) Malaysia has reviewed the document and support APPPC comments
G	(General Comment)	C	Category : SUBSTANTIVE (1410) United Kingdom (26 Sep 2023 5:18 PM) The UK supports the comments the EPPO secretariat have submitted on behalf of those EPPO member countries which are not part of the European Union.
G	(General Comment)	C	Category : TECHNICAL

		<p>(1352) European Union (26 Sep 2023 3:49 PM) It is stated that the parts in specific colours are transcribed from ISPMs 2 and 11. However, when reading the document, we noticed that some modifications have been made in this coloured text when compared with the original ISPM. The specific paragraphs where changes have been introduced should be highlighted.</p>
G	(General Comment)	<p>C <i>Category : EDITORIAL</i> (1351) European Union (26 Sep 2023 3:48 PM) Global changes needed to the draft:</p> <ul style="list-style-type: none"> • Replace “an LMO” with “a LMO” (19 places). • Ensure consistency with abbreviations. Follow the usual convention of writing a phrase out in full followed by the abbreviation in () the first time the phrase is used. All following uses of the phrase should use the abbreviation. NPPO is a good example in the text. • “e.g.” is used many times in the draft text. It is our understanding that “such as”, or “for example” are preferred terms. Please check with IPPC / FAO style guidance. • The term “injury” should be replaced by “damage” in the whole draft (it’s been used 6 times). The suitability of the term “injurious” might also be questioned.
G	(General Comment)	<p>C <i>Category : TECHNICAL</i> (1350) European Union (26 Sep 2023 3:48 PM) Global changes needed to the draft</p> <ul style="list-style-type: none"> • Be consistent with the usage of “consequences” and “impact” (with reference to economic, environmental and social consequences/impact). “Consequences” is used over 70 times and

		<p>"impact" over 30 times. Choose one or the other. In our opinion "consequences" is a better term to be used as "impact" is only used in association with RNQPs.</p> <ul style="list-style-type: none"> It is said (para 20) that the word "consequences" (without the qualifier of "economic" or "environmental") is used, except where a special focus on "environmental" or "economical" consequences is indicated. This should be carried out throughout the standard. There are number of specific mentions to economic consequences/impacts. In para 934 (title of section 5.1.4), the text is still 'Potential for economic consequences in PRA area' There are a range of phrases used in relation to other authorities, for example "other authorities" (141), "appropriate authorities" (156, 515) "other agencies or authorities" (545), "relevant competent authorities" (829), "relevant authorities" (846). Suggest only one phrase is selected and used consistently. Change "analysis" to "PRA" throughout the text for consistency and accuracy (unless analysis is used to describe something broader than PRA or another piece of analysis).
G	(General Comment)	<p>C Category : TECHNICAL (1349) European Union (26 Sep 2023 3:47 PM)</p> <p>Swap sections 2 'Aspects common to all PRA stages' and 3 'Scope of PRA' so that all of current section 2 becomes new section 3 and all of current section 3 becomes new section 2. The reason for this is that section 1 describes the framework for PRA and begins with the types of organisms that can be assessed (see paragraph 86). Given that there is mention of the types of organisms that can be subject to PRA in section 1 it would be more logical for the text relating to</p>

			plants as pests and LMOs (section 3 text) to come next so that text relating to types of pests are closer and link better. At this point the reader is aware of the framework for PRA and that it applies to all types of plant pests, including plants as pests and LMOs. Issues that apply to all PRAs i.e. current section 2 text, then ends the text before moving into the annexes.
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (1348) European Union (26 Sep 2023 3:47 PM) The level of obligation should be checked in the whole draft for consistency. For example between paragraphs 150 (should), 152 (shall) and paragraph 168.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (1347) European Union (26 Sep 2023 3:46 PM) This standard is about pest risk analysis. However, for commodity risk assessment, selection of the pests relevant for the commodities is essential before a PRA can be performed.</p> <p>A sentence could be added to this standard to express this and reference could be made to EPPO Standard PM 9/05 Preparation of pest lists in the framework of commodity PRAs.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (1346) European Union (26 Sep 2023 3:46 PM) The probability of transfer to a suitable host is highly dependent on the pathway involved. Because the assessment of the probability of entry is performed pathway by pathway, this assessment can easily integrate the 'transfer' factor. On the contrary, the assessment of the probability of establishment is usually performed as a whole, based on biological characteristics.</p> <p>The PRA is used to identify the pathways at risk that would need to be regulated.</p>

		<p>Analysing the transfer in the entry section ensures that the transfer is analysed for each individual pathway. Analysing the probability of transfer in the establishment section and not considering it pathway by pathway could lead to the selection for regulation of some pathways, even though the risk of transfer from these particular pathways is considered negligible (e.g. transfer from fruits to orchards for some particular pests). This could result in unnecessary regulation. (Cf. underlying 'necessity' principle).</p> <p>Some guidance should be provided on how to evaluate the probability of transfer when different commodities with different intended uses have been identified as pathways for the pest in question.</p> <p>If one of the pathways has as an intended use of planting, then the probability of transfer is usually high. However, what if plants for planting represent a very limited part of the commodities imported and fruits the majority, how is the probability of transfer evaluated? Guidance should be given.</p> <p>Nothing is mentioned in section 3.2.2 (Probability of transfer to a suitable host). In the previous version of the standard, it was clear that transfer should be evaluated for the different pathways. By moving it to establishment, this is no longer that clear.</p> <p>Even if you continue considering it part of establishment, it is not practical to consider together with the establishment probability because the transfer is highly dependent on the pathway, which is normally not considered when assessing establishment.</p>
G	(General Comment)	<p>C Category : TECHNICAL (1343) EPPO (26 Sep 2023 10:55 AM) It is stated that the parts in specific colours</p>

		are transcribed from ISPMs 2 and 11. However, when reading the document, we noticed that some modifications have been made in this coloured text when compared with the original ISPM. The specific paragraphs where changes have been introduced should be highlighted.
G	(General Comment)	<p>C <i>Category : EDITORIAL (1342) EPPO (26 Sep 2023 10:55 AM)</i> The following global changes are needed to the draft:</p> <ul style="list-style-type: none"> • Replace "an LMO" with "a LMO" (19 places). • Ensure consistency with abbreviations. Follow the usual convention of writing a phrase out in full followed by the abbreviation in () the first time the phrase is used. All following uses of the phrase should use the abbreviation. NPPO is a good example in the text. • "e.g." is used many times in the draft text. It is our understanding that "such as", or "for example" are preferred terms. Please check with IPPC / FAO style guidance. • The term "injury" should be replaced by "damage" in the whole draft (it's been used 6 times). The suitability of the term "injurious" might also be questioned.
G	(General Comment)	<p>C <i>Category : TECHNICAL (1341) EPPO (26 Sep 2023 10:55 AM)</i> The following global changes are needed to the draft:</p> <ul style="list-style-type: none"> • Be consistent with the usage of "consequences" and "impact" (with reference to economic, environmental and social consequences/impact). "Consequences" is used over 70 times and "impact" over 30 times. Choose one or the other. In our opinion "consequences" is a better term to be used as "impact" is only

		<p>used in association with RNQPs.</p> <ul style="list-style-type: none"> It is said (para 20) that the word "consequences" (without the qualifier of "economic" or "environmental") is used, except where a special focus on "environmental" or "economical" consequences is indicated. This should be carried out throughout the standard. There are number of specific mentions to economic consequences/impacts. In para 934 (title of section 5.1.4), the text is still 'Potential for economic consequences in PRA area' There are a range of phrases used in relation to other authorities, for example "other authorities" (141), "appropriate authorities" (156, 515) "other agencies or authorities" (545), "relevant competent authorities" (829), "relevant authorities" (846). Suggest only one phrase is selected and used consistently. Change "analysis" to "PRA" throughout the text for consistency and accuracy (unless analysis is used to describe something broader than PRA or another piece of analysis).
G	(General Comment)	<p>C Category : TECHNICAL (1340) EPPO (26 Sep 2023 10:55 AM) Swap sections 2 'Aspects common to all PRA stages' and 3 'Scope of PRA' so that all of current section 2 becomes new section 3 and all of current section 3 becomes new section 2. The reason for this is that section 1 describes the framework for PRA and begins with the types of organisms that can be assessed (see paragraph 86). Given that there is mention of the types of organisms that can be subject to PRA in section 1 it would be more logical for the text relating to plants as pests and LMOs (section 3 text) to come next so that text relating to types of pests are closer and link better. At this point the reader is aware of the framework for</p>

		PRA and that it applies to all types of plant pests, including plants as pests and LMOs. Issues that apply to all PRAs i.e. current section 2 text, then ends the text before moving into the annexes.
G	(General Comment)	C <i>Category : TECHNICAL (1339) EPPO (26 Sep 2023 10:55 AM)</i> The level of obligation should be checked in the whole draft for consistency. For example between paragraphs 150 (should), 152 (shall) and paragraph 168.
G	(General Comment)	C <i>Category : SUBSTANTIVE (1338) EPPO (26 Sep 2023 10:55 AM)</i> This standard is about pest risk analysis. However, for commodity risk assessment, selection of the pests relevant for the commodities is essential before a PRA can be performed. A sentence could be added to this standard to express this and reference could be made to EPPO Standard PM 9/05 Preparation of pest lists in the framework of commodity PRAs.
G	(General Comment)	C <i>Category : SUBSTANTIVE (1337) EPPO (26 Sep 2023 10:55 AM)</i> The probability of transfer to a suitable host is highly dependent on the pathway involved. Because the assessment of the probability of entry is performed pathway by pathway, this assessment can easily integrate the 'transfer' factor. On the contrary, the assessment of the probability of establishment is usually performed as a whole, based on biological characteristics. The PRA is used to identify the pathways at risk that would need to be regulated. Analysing the transfer in the entry section ensures that the transfer is analysed for each individual pathway. Analysing the probability of transfer in the establishment section and not considering it pathway by pathway could lead to the selection for regulation of some pathways, even though

		<p>the risk of transfer from these particular pathways is considered negligible (e.g. transfer from fruits to orchards for some particular pests). This could result in unnecessary regulation. (Cf. underlying 'necessity' principle).</p> <p>Some guidance should be provided on how to evaluate the probability of transfer when different commodities with different intended uses have been identified as pathways for the pest in question.</p> <p>If one of the pathways has as an intended use of planting, then the probability of transfer is usually high. However, what if plants for planting represent a very limited part of the commodities imported and fruits the majority, how is the probability of transfer evaluated? Guidance should be given.</p> <p>Nothing is mentioned in section 3.2.2 (Probability of transfer to a suitable host). In the previous version of the standard, it was clear that transfer should be evaluated for the different pathways. By moving it to establishment, this is no longer that clear.</p> <p>Even if you continue considering it part of establishment, it is not practical to consider together with the establishment probability because the transfer is highly dependent on the pathway, which is normally not considered when assessing establishment.</p>
G	(General Comment)	<p>C Category : SUBSTANTIVE (1118) APPPC (26 Sep 2023 10:36 AM) APPPC would like to propose to the Standards Committee to create an Expert Working Group and revise the PRA standard into a new one.</p> <p>The diagram in Appendix 1, PRA Framework, should be included under the Outline of the Requirements.</p>

			A bigger box should include the three (3) Stages of PRA and delete the "Management option". All "suitable host" must be changed to "host" in all this standard.
G	(General Comment)	C	<i>Category : EDITORIAL (1091) Korea, Republic of (26 Sep 2023 4:29 AM)</i> Korea supports APPPC's comment on this ISPMs.
G	(General Comment)	C	<i>Category : SUBSTANTIVE (1090) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM)</i> Guyana supports the reorganization and revision of the Pest Risk Analysis Standard
G	(General Comment)	C	<i>Category : SUBSTANTIVE (1089) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM)</i> 1. Supports the reorganization of the standard but does not believe that the annexes should be separated as they are parts of a single process. 2. Recommends the development of an additional annex on PRA for beneficial organisms
G	(General Comment)	C	<i>Category : TECHNICAL (1088) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM)</i> St Lucia endorses the changes made to the standard.
G	(General Comment)	C	<i>Category : SUBSTANTIVE (1087) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM)</i> Barbados supports the reorganization and revision of the standard. The fact that it seeks to harmonise the existing standards that speak to PRA is justifiable given that all elements of this important activity should be found in the same place.
G	(General Comment)	C	<i>Category : EDITORIAL</i>

		(1086) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM) The proposed reorganization of this standard is quite useful.
G	(General Comment)	C <i>Category : SUBSTANTIVE</i> (1061) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM) We support PRA organization
G	(General Comment)	C <i>Category : SUBSTANTIVE</i> (1051) Malawi (23 Sep 2023 2:34 PM) We support the reorganization and revision of PRA standards
G	(General Comment)	C <i>Category : SUBSTANTIVE</i> (933) PPPO (17 Sep 2023 1:13 PM) In connection to paragraph 2.3.2, if the PRA process does not need to be long and complex, reciprocally it would be good to have a more concise standard. Therefore, the standard in its current form needs to be reviewed.
G	(General Comment)	C <i>Category : SUBSTANTIVE</i> (932) PPPO (17 Sep 2023 1:13 PM) The reorganised standard on PRA should be fully revised, new Expert Working Group (EWG) should be established and scope defined. The reorganisation of the PRA standards has highlighted the importance of these standards and that they have not undergone major review since they were developed, other than to include supplementary information on environmental pests and Living Modified Organisms. Although the reorganisation has removed duplicated information, the resulting reorganised standard is still a very large one and has not separated requirements from guidance information. We acknowledge that the EWG was not tasked to do this, nor would time have allowed for this. Because of these issues, the reorganised standard would benefit from a full review to simplify it to core requirements and remove guidance information to appropriate

			implementation resources. A simplification of the standard could allow for different approaches to achieving the same outcome, e.g. measures-driven risk assessments.
G	(General Comment)	C	<i>Category : SUBSTANTIVE (905) Thailand (15 Sep 2023 8:06 AM)</i> Thailand supports all comments from APPC.
G	(General Comment)	C	<i>Category : TRANSLATION (904) COSAVE (12 Sep 2023 9:58 PM)</i> Cosave's translation comments to this draft are made in the spanish version of the OCS
G	(General Comment)	C	<i>Category : SUBSTANTIVE (782) COSAVE (12 Sep 2023 7:08 PM)</i> 1) "Effectiveness" should be translated as "efectividad" 2) We suggest to keep the Title "Pest risk analysis for quarantine pests" as well as the number ISPM 11. 3) Annex 4 on environmental risks should be incorporated to the core text and appropriated Annexes to avoid repetition. 4) The whole draft should be revised to update the use of Glossary terms and their translation 5) We do not agree to use the word "consequences" without the qualifier of "economic". We suggest to maintain use of terms related to potential economic importance as they are used in the current ISPM 11. Supplement 2: of ISPM 5 explains that all types of impacts are included under the term "economic consequences". In addition this expression is part of the definition of quarantine pest
G	(General Comment)	C	<i>Category : TECHNICAL (744) Brazil (8 Sep 2023 4:13 PM)</i> Brazil supports comments provided by COSAVE
G	(General Comment)	C	<i>Category : SUBSTANTIVE (627) Uruguay (7 Sep 2023 3:07 PM)</i> 1) "Effectiveness" should be translated as "efectividad" 2) We suggest to keep the Title "Pest risk analysis for quarantine pests" as well as the number ISPM 11.

			<p>3) Annex 4 on environmental risks should be incorporated to the core text and appropriated Annexes to avoid repetition.</p> <p>4) The whole draft should be revised to update the use of Glossary terms and their translation</p> <p>5) We do not agree to use the word "consequences" without the qualifier of "economic" We suggest to maintain use of terms related to potential economic importance as they are used in the current ISPM 11. Supplement 2: of ISPM 5 explains that all types of impacts are included under the term "economic consequences". In addition this expression is part of the definition of quarantine pest</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (611) Tanzania (5 Sep 2023 10:20 AM) Tanzania supports the review of this standard, however apart from organizing the ISPMs into one comprehensive ISPM on PRA, IPPC should also look into establishing an IPPC-recognised PRA tool. CABI PRA tool has been of great help, it is high time now for IPPC to have its own tool.</p>
G	(General Comment)	C	<p><i>Category : EDITORIAL</i> (588) Iraq (30 Aug 2023 11:39 PM) We have no modifications or additions</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (580) Mozambique (29 Aug 2023 3:02 PM) Mozambique agrees with this standard as it reduces confusion of many standards for different stages of the PRA. This standard will make PRA easier than before</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (573) United States of America (25 Aug 2023 5:45 PM) We like this new layout of the PRA related ISPMs and consider it as a general improvement.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (558) New Zealand (10 Aug 2023 6:16 AM) The reorganised standard on PRA should be</p>

			<p>fully revised, new Expert Working Group (EWG) should be established and scope defined.</p> <p>The reorganisation of the PRA standards has highlighted the importance of these standards and that they have not undergone major review since they were developed, other than to include supplementary information on environmental pests and Living Modified Organisms. Although the reorganisation has removed duplicated information, the resulting reorganised standard is still a very large one and has not separated requirements from guidance information. We acknowledge that the EWG was not tasked to do this, nor would time have allowed for this.</p> <p>Because of these issues, the reorganised standard would benefit from a full review to simplify it to core requirements and remove guidance information to appropriate implementation resources. A simplification of the standard could allow for different approaches to achieving the same outcome, e.g. measures-driven risk assessments.</p>
1	Introduction to the reorganization and revision of PRA standards (not an official part of the standard)	C	<p><i>Category : SUBSTANTIVE (1709) Russian Federation (29 Sep 2023 4:21 PM)</i></p> <p>General Comment: The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System.</p>
1	Introduction to the reorganization and revision of PRA standards (not an official part of the standard)	C	<p><i>Category : SUBSTANTIVE (1652) China (28 Sep 2023 2:52 AM)</i></p> <p>China support APPPC comments. We want to re-call for experts to modify the whole standards. The whole draft suggested to be compared to ISPM 2 and 11 and corrected the differences.</p>
1	Introduction to the reorganization and revision of PRA standards (not an official part of the standard)	C	<p><i>Category : EDITORIAL (601) Guyana (4 Sep 2023 12:06 AM)</i></p> <p>Guyana supports the reorganization and revision of the Pest Risk Analysis Standard</p>
2	Pest <u>risk analysis</u> <u>Risk Analysis</u> (PRA) is a core process within the scope of the	P	<p><i>Category : EDITORIAL (589) Ghana (30 Aug 2023 11:48 PM)</i></p>

	IPPC. Guidance for national plant protection organizations (NPPOs) is currently provided in ISPM 2 (<i>Framework for pest risk analysis</i> , adopted in 1995, revised in 2007) and ISPM 11 (<i>Pest risk analysis for quarantine pests</i> , adopted in 2001, revised in 2003, 2004, and 2013).		
18	Supplements on the environmental impacts (S1) and LMOs (S2). The supplemental text on environmental impacts (S1) and the section addressing plants as quarantine pests were moved to Annexes 4 and 6, respectively. The supplemental text on LMOs (S2) was moved to Annex 5 except where it was necessary to retain it in the text.	C	<p><i>Category : SUBSTANTIVE (1679) Australia (29 Sep 2023 5:46 AM)</i></p> <p>Suggest to retain as a supplement, merge into Annex 2, or include text to link the sections together.</p> <p>The reason for this is that removal of this supplementary text will remove the linkage of the standard to the consequence section in Annex 2.</p>
18	Supplements on the environmental impacts (S1) and LMOs (S2). The supplemental text on environmental impacts (S1) and the section addressing plants as quarantine pests were moved to Annexes 4 and 6, respectively. The supplemental text on LMOs (S2) was moved to Annex 5 except where it was necessary to retain it in the text.	C	<p><i>Category : SUBSTANTIVE (609) Madagascar (5 Sep 2023 10:10 AM)</i></p> <p>need a definitions and precision</p>
20	Consequences. The expert working group (EWG) agreed that consequences to be considered include environmental, economic, social and other consequences, and economic consequences do not need to be mentioned specifically. The word “consequences” (without the qualifier of “economic” or “environmental”) is used, except where a special focus on “environmental” or “economical” consequences is indicated.	C	<p><i>Category : SUBSTANTIVE (559) New Zealand (10 Aug 2023 6:19 AM)</i></p> <p>New Zealand supports the EWG's position on consequences, which should be considered more broadly, and should be reviewed for consistency throughout the standard.</p>
56	Scope	C	<p><i>Category : SUBSTANTIVE (1039) Canada (22 Sep 2023 5:36 PM)</i></p> <p>General comment: The revision of the PRA standard provides a timely opportunity to include climate change considerations in PRA.</p> <p>This inclusion would be in keeping with the IPPC's 2020-2030 Development Agenda Item, “Assessment and Management of Climate Change Impacts on Plant Health”. The desired outcome for the agenda item is that by 2030, the impacts of climate change on plant health and the safe trade of plants are evaluated, especially in relation to pest risk assessment and pest risk management</p>

			issues. In keeping with the IPPC and many RPPOs and NPPOs identifying climate change as a priority, we suggest that climate change considerations be included in the reorganized and revised PRA standard. Specific comments are provided in the text in this regards
56	Scope	C	(156) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 9:50 PM] Black - Scope is from ISPM2 but most texts were updated
58	This standard describes the overall structure and concepts underlying the process of pest risk analysis (PRA) for quarantine pests within the scope of the IPPC. It covers the integrated processes of the three stages of PRA – initiation, pest risk assessment and pest risk management. <u>Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue delay are addressed.</u> Specific guidance is <u>also</u> provided on the analysis of risks posed by pests to the environment and biological diversity, risks posed by plants that are living modified organisms (LMOs), and PRA for plants as quarantine pests. <u>Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue delay are also addressed.</u>	P	<i>Category : TECHNICAL</i> (1355) European Union (26 Sep 2023 3:52 PM) These changes would only apply if our proposal to rearrange sections 2 and 3 is agreed to.
58	This standard describes the overall structure and concepts underlying the process of pest risk analysis (PRA) <u>for to determine if pests are</u> quarantine pests within the scope of the IPPC. It covers the integrated processes of the three stages of PRA – initiation, pest risk assessment and pest risk management. Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue delay are addressed. Specific guidance is also provided on the analysis of risks posed by pests to the environment and biological diversity, risks posed by plants that are living modified organisms (LMOs), and PRA for plants as quarantine pests.	P	<i>Category : EDITORIAL</i> (1354) European Union (26 Sep 2023 3:51 PM) Improved clarity.
58	This standard describes the overall structure and concepts underlying the process of pest risk analysis (PRA) for quarantine pests within the scope of the IPPC. It covers the integrated processes of the three stages of PRA – initiation, pest risk assessment and pest risk management. Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue	P	<i>Category : TECHNICAL</i> (1353) European Union (26 Sep 2023 3:50 PM) 1) More precise. 2) LMOs are not only plants (see ISPM 5 definition) and Annex 5 is not restricted to

	delay are addressed. Specific guidance is also provided on the analysis of risks posed by pests to the environment and biological diversity, <u>pest</u> risks posed by <u>plants that are</u> living modified organisms (LMOs), and PRA for plants as quarantine pests.		LMOs that are plants but also includes biological control agents and other beneficial organisms (e.g. see paragraphs 868 and 873).
58	This standard describes the overall structure and concepts underlying the process of pest risk analysis (PRA) <u>for-to determine if pests are</u> quarantine pests within the scope of the IPPC. It covers the integrated processes of the three stages of PRA – initiation, pest risk assessment and pest risk management. <u>Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue delay are addressed.</u> Specific guidance is <u>also</u> provided on the analysis of risks posed by pests to the environment and biological diversity, <u>pest</u> risks posed by <u>plants that are</u> living modified organisms (LMOs), and PRA for plants as quarantine pests. <u>Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue delay are also addressed.</u>	P	<p><i>Category : TECHNICAL</i> (1119) EPPO (26 Sep 2023 10:55 AM) 1) 'Pest risk' is more precise; 2) LMOs are not only plants (see ISPM 5 definition) and Annex 5 is not restricted to LMOs that are plants but also includes biological control agents and other beneficial organisms (e.g. see paragraphs 868 and 873). Therefore we suggest deleting 'plants that are'; 3) other suggestions to improve clarity; 4) Sentence moved, these changes would only apply if our proposal to rearrange sections 2 and 3 is agreed to.</p>
58	This standard describes <u>the overall structure and concepts underlying the</u> process of pest risk analysis (PRA) for quarantine <u>pests within the scope of the IPPC</u> pests. It covers the integrated processes of the three stages of PRA – initiation, pest risk assessment and pest risk management. Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue delay are addressed. Specific guidance is also provided on the analysis of risks posed by pests to the environment and biological diversity, risks posed by plants that are living modified organisms (LMOs), and PRA for plants as quarantine pests.	P	<p><i>Category : TECHNICAL</i> (783) COSAVE (12 Sep 2023 7:09 PM) To simplify, all ISPMs are within the scope of the IPPC.</p>
58	This standard describes the <u>overall structure and concepts underlying the</u> process of pest risk analysis (PRA) for quarantine <u>pests within the scope of the IPPC</u> pests. It covers the integrated processes of the three stages of PRA – initiation, pest risk assessment and pest risk management. Uncertainty, information gathering, documentation, pest risk communication, consistency and avoidance of undue delay are addressed. Specific guidance is also provided on the analysis of risks posed by pests to the environment and biological diversity, risks posed by plants that are living modified organisms (LMOs), and PRA for plants as quarantine pests.	P	<p><i>Category : TECHNICAL</i> (628) Uruguay (7 Sep 2023 3:10 PM) To simplify, all ISPMs are within the scope of the IPPC.</p>
58	This standard describes the overall structure and concepts underlying the process of pest risk analysis (PRA) for quarantine pests within the scope of the IPPC. It	P	<p><i>Category : EDITORIAL</i> (574) United States of America (25 Aug</p>

	covers the integrated processes of the three stages of PRA – initiation, pest risk assessment and pest risk management. Uncertainty, information gathering, documentation, pest risk communication, <u>eonsistency_consistency</u> , and avoidance of undue delay are addressed. Specific guidance is also provided on the analysis of risks posed by pests to the environment and biological diversity, risks posed by plants that are living modified organisms (LMOs), and PRA for plants as quarantine pests.		2023 5:46 PM) We propose global change - Comma is needed for clarity here and for consistency in other similar sentences through the entire document. We recommend checking the IPPC Style Guide for consistency with using "Oxford comma".
59	This standard does not cover PRA for regulated non-quarantine pests, guidance for which is provided in ISPM 21 (<i>Pest risk analysis for regulated non-quarantine pests</i>).	C	(157) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 9:51 PM] Black - new text.
61	References	C	<i>Category : EDITORIAL</i> (906) PPPO (17 Sep 2023 1:13 PM) For easier reading, references should be placed at the back (that is, at the end) of the text/ISPM.
70	Outline of requirements	P	<i>Category : EDITORIAL</i> (1096) APPPC (26 Sep 2023 10:36 AM)
70	Outline of requirements	C	<i>Category : EDITORIAL</i> (907) PPPO (17 Sep 2023 1:13 PM) The diagram (infographic) from Appendix 1 should be moved up front to provide a clearer overview of the process.
70	Outline of requirements	C	<i>Category : TECHNICAL</i> (784) COSAVE (12 Sep 2023 7:10 PM) Since section "Outline of requirements" should contain a summary of ISPM's content, we suggest to integrate Section 1 "Framework for PRA" to this section
70	Outline of requirements	C	<i>Category : TECHNICAL</i> (630) Uruguay (7 Sep 2023 3:24 PM) Since section "Outline of requirements" should contain a summary of ISPM's content, we suggest to integrate Section 1 "Framework for PRA" to this section
71	The <u>PRA</u> <u>Pest Risk Analysis (PRA)</u> is <u>an appropriate a</u> tool <u>to for</u> : <u>evaluating</u> <u>biological and other economic evidence to</u> identify pests and pathways of <u>potential</u> <u>phytosanitary quarantine</u> concern for a specified area and evaluate their pest risk; identify endangered areas; and, if appropriate, identify pest risk management options and determine the most appropriate phytosanitary measures, commensurate	P	<i>Category : SUBSTANTIVE</i> (1713) Mexico (29 Sep 2023 10:35 PM) Better text and it makes more sense to include the full name of the acronym.

	with the identified risk, to reduce the risk of introduction and spread of the pests concerned. Pest risk analysis for quarantine pests consists of three stages: 1: Initiation; 2: Pest risk assessment; and 3: Pest risk management.		
71	The <u>objectives of a PRA is an appropriate tool to: are, for a specified area, to identify pests and/or pathways of potential phytosanitary quarantine concern for a specified area</u> and evaluate their pest risk; <u>to identify endangered areas;</u> and, if appropriate, <u>to identify pest risk management options.</u> PRA consists of <u>three stages, (1) initiation, (2) pest risk assessment, and determine the most appropriate phytosanitary measures(3) pest risk management.</u> Stage 1, <u>commensurate with the identified riskinitiation, to reduce involves</u> the <u>identification of pests or pathways for which pest risk assessment is needed.</u> Stage 2, pest risk assessment, determines whether an organism, identified in stage 1 as a pest, or associated with a pathway, is a quarantine pest. Quarantine status for a pest is characterized in terms of its probability of introduction (<u>entry and spread establishment</u>) and spread, and consequences of the pests concernedintroduction. Pest Where necessary, Stage 3, pest risk analysismanagement, involves identifying management options, then evaluating them for quarantine pests consists of three stagesefficacy, feasibility and impact in order to select those that are appropriate to reduce the pest risks identified during Stage 2.: 1: Initiation; 2: Pest risk assessment; and 3: Pest risk management.	P	Category : TECHNICAL (1357) European Union (26 Sep 2023 3:55 PM) Improved drafting.
71	<u>The PRA is an appropriate tool to: identify pests and pathways of potential phytosanitary concern for a specified area and evaluate their pest risk; identify endangered areas; and, if appropriate, identify pest risk management options and determine the most appropriate phytosanitary measures, commensurate with the identified risk, to reduce the risk of introduction and spread of the pests concerned.</u> Pest risk analysis for quarantine pests consists of three stages: 1: Initiation; 2: Pest risk assessment; and 3: Pest risk management. <u>The objectives of a PRA are, for a specified area, to identify pests and/or pathways of quarantine concern and evaluate their risk, to identify endangered areas, and, if appropriate, to identify risk management options.</u> PRA consists of three stages, (1) initiation, (2) pest risk assessment, and (3) pest risk management. Stage 1, initiation, involves the identification of pests or pathways for which pest risk assessment is needed. Stage 2, pest risk assessment, determines whether an organism, identified in stage 1 as a pest, or, associated with a pathway, is a quarantine pest. Quarantine status for a pest is characterized in terms of its probability of introduction (<u>entry and establishment</u>), spread, and consequences of introduction. Where necessary, Stage 3, pest risk management, involves identifying management options then evaluating them for efficacy, feasibility and impact in order to select those that are appropriate to	P	Category : TECHNICAL (1120) EPPO (26 Sep 2023 10:55 AM) Improved drafting

	<u>reduce the risks identified during Stage 2</u>		
71	The PRA is an appropriate tool to: identify pests and pathways of potential phytosanitary concern for a specified area and evaluate their pest risk; identify endangered areas; and, if appropriate, identify pest risk management options and determine the most appropriate phytosanitary measures, commensurate with the identified risk, to reduce the risk of <u>introduction-introduction, establishment</u> and spread of the pests concerned. Pest risk analysis for quarantine pests consists of three stages: 1: Initiation; 2: Pest risk assessment; and 3: Pest risk management.	P	<i>Category : SUBSTANTIVE (1052) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i>
71	The PRA is <u>an appropriate_a</u> tool <u>of evaluation of biological or other scientific and economic evidence</u> to: identify pests and pathways of potential <u>phytosanitary quarantine</u> concern for a specified area and evaluate their pest risk; identify endangered areas; and, if appropriate, identify pest risk management options and determine the most appropriate phytosanitary measures, commensurate with the identified <u>pest</u> risk, to reduce the risk of introduction and spread of the pests concerned. Pest risk analysis for quarantine pests consists of three stages: 1: Initiation; 2: Pest risk assessment; and 3: Pest risk management.	P	<i>Category : TECHNICAL (785) COSAVE (12 Sep 2023 7:12 PM) 1) To be aligned to the definition of PRA in ISPM 5 2) For consistency with ISPM 5 and to adjust to the English version</i>
71	The PRA is <u>an appropriate_a</u> tool <u>of evaluation of biological or other scientific and economic evidence</u> to: identify pests and pathways of potential <u>phytosanitary quarantine</u> concern for a specified area and evaluate their pest risk; identify endangered areas; and, if appropriate, identify pest risk management options and determine the most appropriate phytosanitary measures, commensurate with the identified <u>pest</u> risk, to reduce the risk of introduction and spread of the pests concerned. Pest risk analysis for quarantine pests consists of three stages: 1: Initiation; 2: Pest risk assessment; and 3: Pest risk management.	P	<i>Category : TECHNICAL (629) Uruguay (7 Sep 2023 3:21 PM) 1) to be aligned with the definition of PRA in ISPM 5</i>
71	The PRA is an appropriate tool to: identify pests and pathways of potential phytosanitary concern for a specified area and evaluate their pest risk; identify endangered areas; and, if appropriate, identify pest risk management options and determine the most appropriate phytosanitary measures, commensurate with the identified risk, to reduce the risk of <u>introduction-introduction, establishment</u> and spread of the pests concerned. Pest risk analysis for quarantine pests consists of three stages: 1: Initiation; 2: Pest risk assessment; and 3: Pest risk management.	P	<i>Category : SUBSTANTIVE  Eritrea (578) Eritrea (28 Aug 2023 4:56 PM)</i>
72	BACKGROUND ARRIÈRE-PLAN	P	<i>Category : SUBSTANTIVE (606) Burkina Faso (5 Sep 2023 8:26 AM) Le paragraphe 2 du contexte de la NIMP 2 a</i>

			été sauté. Dans la légende fournie pour le comité, Le texte en bleu est repris de la NIMP 2
72	BACKGROUND ARRIÈRE-PLAN	P	<i>Category : SUBSTANTIVE (605) Burkina Faso (5 Sep 2023 8:18 AM)</i> CONTEXTE
72	BACKGROUND	C	(158) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 9:52 PM] Blue - Background is from ISPM2
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a <u>PRA</u> for quarantine pests, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, <u>and the pest has the characteristics of a quarantine pest</u> , the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.	P	<i>Category : TECHNICAL (1361) European Union (26 Sep 2023 4:05 PM)</i> The first addition "for quarantine pests" is suggested here to distinguish this PRA process from PRA for RNQPs (which is ISPM 21) and the second addition " and the pest has the characteristics of a quarantine pest" is suggested to ensure all parts of pest categorization are included.
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and <u>economic</u> evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.	C	<i>Category : SUBSTANTIVE (1360) European Union (26 Sep 2023 4:03 PM)</i> Text refers to "economic consequences". Is "economic" necessary? Recall that paragraph 20 (not part of the standard) notes that the consequences to be considered include environmental, economic, social and other consequences, and economic consequences do not need to be mentioned specifically. An alternative would be to retain economic and include the other consequences mentioned in paragraph 20. (Please see our general comment on this issue.)
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an	C	<i>Category : EDITORIAL (1359) European Union (26 Sep 2023 4:00 PM)</i>

	<p>organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.</p>		<p>General comment: This sentence would be better placed after the second sentence. The next sentence would then read better as follows: "If the organism is a pest...".</p>
74	<p>Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.</p>	C	<p><i>Category : EDITORIAL (1122) EPPO (26 Sep 2023 10:55 AM)</i> General comment: This sentence would be better placed after the second sentence. The next sentence would then read better as follows: "If the organism is a pest...".</p>
74	<p><u>Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA for quarantine pests, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, and the pest has the characteristics of a quarantine pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.</u> <u>Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential</u></p>	P	<p><i>Category : TECHNICAL (1121) EPPO (26 Sep 2023 10:55 AM)</i> Text refers to "economic consequences". Is "economic" necessary? Recall that paragraph 20 (not part of the standard) notes that the consequences to be considered include environmental, economic, social and other consequences, and economic consequences do not need to be mentioned specifically. An alternative would be to retain economic and include the other consequences mentioned in paragraph 20. (Please see our general comment on this issue.) The first addition "for quarantine pests" is suggested here to distinguish this PRA process from PRA for RNQPs (which is ISPM 21) and the second addition " and the pest</p>

	<p>economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.</p>		has the characteristics of a quarantine pest" is suggested to ensure all parts of pest categorization are included.
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction <ins>introduction, establishment</ins> and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.	P	<i>Category : SUBSTANTIVE (1053) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i>
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations <ins>measures</ins> .	P	<i>Category : TECHNICAL (787) COSAVE (12 Sep 2023 7:14 PM)</i> "Phytosanitary regulations" should be replaced by "phytosanitary measures" for consistency
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for	C	<i>Category : TRANSLATION (786) COSAVE (12 Sep 2023 7:13 PM)</i> "Evidence" should be translated as "evidencias" In the Spanish version "pruebas" should be replaced by "evidencias"

	<p>others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.</p>		
74	<p>Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.</p>	C	<p><i>Category : TRANSLATION (632) Uruguay (7 Sep 2023 3:29 PM)</i> "Evidence" should be translated as "evidencias"</p>
74	<p>Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulationsmeasures.</p>	P	<p><i>Category : TECHNICAL (631) Uruguay (7 Sep 2023 3:27 PM)</i> "Phytosanitary regulations" should be replaced by "phytosanitary measures" for consistency</p>
74	<p>Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest</p>	C	<p><i>Category : TECHNICAL (610) Tanzania (5 Sep 2023 10:10 AM)</i> probability of introduction establishment</p>

	risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.		
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest <u>pest or not</u> . If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.	P	Category : EDITORIAL (579) Eritrea (29 Aug 2023 9:30 AM)
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of potential economic consequences in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests <u>or could become pests</u> should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level. Subsequently, these pest risk management options may be used to establish phytosanitary regulations.	P	Category : TECHNICAL (561) New Zealand (10 Aug 2023 6:32 AM) General comment: Assume this includes whether an organism could be a pest if it were to arrive in a new area. This is a minor example that the standard will benefit from a revision.
74	Pest risk analysis provides the rationale for phytosanitary measures for a specified PRA area. In a PRA, scientific evidence is evaluated to determine whether an organism is a pest. If it is a pest, the analysis evaluates the probability of introduction and spread of the pest and the magnitude of <u>potential economic consequences</u> in a defined area, using biological or other scientific and economic evidence. For some organisms, it is known beforehand that they are pests, but for others, the question of whether or not they are pests should initially be resolved. If the pest risk is deemed unacceptable, the analysis may continue by suggesting pest risk management options that could reduce the pest risk to an acceptable level.	C	Category : TECHNICAL (560) New Zealand (10 Aug 2023 6:26 AM) See comment regarding consequences.

	<p>Subsequently, these pest risk management options may be used to establish phytosanitary regulations.</p>		
75	<p>The pest risk posed by the introduction of organisms associated with a particular pathway, such as a commodity, should also be considered in a PRA. The commodity itself may not pose a pest risk but may harbour organisms that are pests. Lists of such organisms are compiled during the initiation stage. Specific <u>organisms-pests</u> may then be analysed individually, or in groups where individual species share common biological characteristics.</p>	P	<p><i>Category : EDITORIAL (1362) European Union (26 Sep 2023 4:06 PM)</i> Revisit (in the whole draft) the use of "organism" versus "pest".</p>
75	<p>The pest risk posed by the introduction of organisms associated with a particular pathway, such as a commodity, should also be considered in a PRA. The commodity itself may not pose a pest risk but may harbour organisms that are pests. Lists of such organisms are compiled during the initiation stage. Specific <u>organisms-pests</u> may then be analysed individually, or in groups where individual species share common biological characteristics.</p>	P	<p><i>Category : EDITORIAL (1123) EPPO (26 Sep 2023 10:55 AM)</i> Revisit (in the whole draft) the use of "organism" versus "pest".</p>
76	<p>Less commonly, the commodity itself may pose a pest risk. When organisms imported as commodities (such as plants for planting, biological control agents and other beneficial organisms, and LMOs) are deliberately introduced and established in intended habitats in new areas, there is a risk that they may accidentally spread to unintended <u>habitats</u> or <u>unintended targets</u> (such as plants and plant products) in the intended habitat, causing injury to plants or plant products. Such risks may also be analysed using the PRA process.</p>	P	<p><i>Category : TECHNICAL (1365) European Union (26 Sep 2023 4:09 PM)</i> There is also a risk that the organism may attack unintended targets (such as plants and plant products) in the intended habitat, not just in an unintended habitat. The paragraph needs to be redrafted to reflect this. See proposal.</p>
76	<p>Less commonly, the commodity itself may pose a pest risk. When organisms imported as commodities (such as plants for planting, biological control agents and other beneficial organisms, and LMOs) are deliberately introduced and established in intended habitats in new areas, there is a risk that they may accidentally spread to unintended habitats, causing <u>injury</u> <u>damage</u> to plants or plant products. Such risks may also be analysed using the PRA process.</p>	P	<p><i>Category : EDITORIAL (1364) European Union (26 Sep 2023 4:08 PM)</i> Oxford dictionary: Injury = harm done to a person's or an animal's body, for example in an accident Damage = physical harm caused to something which makes it less attractive, useful or valuable The term "injury" should be replaced by "damage" in the whole draft (it's been used 6 times). (Please see our general comment on this issue.)</p>
76	<p>Less commonly, the commodity itself may pose a pest risk. When organisms</p>	C	<p><i>Category : TECHNICAL (1363) European Union (26 Sep 2023)</i></p>

	<p>imported as commodities (such as plants for planting, biological control agents and other beneficial organisms, and LMOs) are deliberately introduced and established in intended habitats in new areas, there is a risk that they may accidentally spread to unintended habitats, causing injury to plants or plant products. Such risks may also be analysed using the PRA process.</p>		<p>4:07 PM) The use of "established" here is confusing. Is it "established"? Moreover, according to ISPM 5, "introduction" includes "establishment". So maybe "and established" could be deleted in this sentence.</p>
76	<p>Less commonly, the commodity itself may pose a pest risk. When organisms imported as commodities (such as plants for planting, biological control agents and other beneficial organisms, and LMOs) are deliberately introduced and established in intended habitats in new areas, there is a risk that they may accidentally spread to unintended habitats or unintended targets (such as plants and plant products) in the intended habitat, causing injury damage to plants or plant products. Such risks may also be analysed using the PRA process.</p>	P	<p><i>Category : TECHNICAL (1125) EPPO (26 Sep 2023 10:55 AM)</i> Oxford dictionary: Injury = harm done to a person's or an animal's body, for example in an accident Damage = physical harm caused to something which makes it less attractive, useful or valuable The term "injury" should be replaced by "damage" in the whole draft (it's been used 6 times). (Please see our general comment on this issue.) We have also added the words 'or unintended targets...' as there is also a risk that the organism may attack unintended targets (such as plants and plant products) in the intended habitat, not just in an unintended habitat. The paragraph needs to be redrafted to reflect this.</p>
76	<p>Less commonly, the commodity itself may pose a pest risk. When organisms imported as commodities (such as plants for planting, biological control agents and other beneficial organisms, and LMOs) are deliberately introduced and established in intended habitats in new areas, there is a risk that they may accidentally spread to unintended habitats, causing injury to plants or plant products. Such risks may also be analysed using the PRA process.</p>	C	<p><i>Category : TECHNICAL (1124) EPPO (26 Sep 2023 10:55 AM)</i> The use of "established" here is confusing. Is it "established"? Moreover, according to ISPM 5, "introduction" includes "establishment". So maybe "and established" could be deleted in this sentence.</p>
77	<p>The PRA process is applied to pests of cultivated plants and wild flora, in accordance with the scope of the IPPC. It does not cover the analysis of risks beyond the scope of the IPPC.</p>	P	<p><i>Category : TECHNICAL (1366) European Union (26 Sep 2023 4:09 PM)</i> Delete as already covered in para 171.</p>
77	<p>The PRA process is applied to pests of cultivated plants and wild flora, in accordance with the scope of the IPPC. It does not cover the analysis of risks beyond the scope of the IPPC.</p>	P	<p><i>Category : TECHNICAL (1126) EPPO (26 Sep 2023 10:55 AM)</i> Delete as already covered in para 171.</p>

	<u>beyond the scope of the IPPC.</u>		
78	Provisions of other international agreements <u>may address risk assessment</u> (e.g. the Convention on Biological Diversity and the Cartagena Protocol on Biosafety to that convention (CBD, 2000)).	C	<p>Category : EDITORIAL (1680) Australia (29 Sep 2023 5:48 AM) ISPM 11 mentions this convention in the context of providing information about LMOs not addressing risk assessment. Suggest further clarity around purpose and intention of this point It is unclear what the intention of this point is for</p>
78	Provisions of other international agreements <u>may address risk assessment</u> (e.g. the Convention on Biological Diversity and the Cartagena Protocol on Biosafety to that convention (CBD, 2000)).	P	<p>Category : SUBSTANTIVE (1367) European Union (26 Sep 2023 4:10 PM) This sentence does not mean much and isn't of any help here. Of course, other international agreements may address risk assessment.</p>
78	Provisions of other international agreements <u>may address risk assessment</u> (e.g. the Convention on Biological Diversity and the Cartagena Protocol on Biosafety to that convention (CBD, 2000)).	P	<p>Category : SUBSTANTIVE (1127) EPPO (26 Sep 2023 10:55 AM) This sentence does not mean much and isn't of any help here. Of course, other international agreements may address risk assessment.</p>
79	The principles of necessity, managed risk, minimal impact, <u>transparency</u> , harmonization, non-discrimination, technical justification, cooperation, and equivalence, as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.	P	<p>Category : EDITORIAL (1369) European Union (26 Sep 2023 4:11 PM) Missing comma.</p>
79	The principles of <u>necessity</u> <u>sovereignty</u> , managed risk, minimal impact, transparency harmonization, non-discrimination, technical justification, cooperation, and equivalence, as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.	P	<p>Category : EDITORIAL (1368) European Union (26 Sep 2023 4:11 PM) Sovereignty is one of the IPPC's core principles.</p>
79	The principles of <u>sovereignty</u> , necessity, managed risk, minimal impact, <u>transparency</u> <u>transparency</u> , harmonization, non-discrimination, technical	P	<p>Category : EDITORIAL (1128) EPPO (26 Sep 2023 10:55 AM)</p>

	justification, cooperation, and equivalence, as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.		Sovereignty is on the the IPPCs core principles. missing comma
79	The <u>basic</u> principles of necessity, managed risk, minimal impact, transparency harmonization, non-discrimination, technical justification, cooperation, and equivalence, as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.	P	<i>Category : SUBSTANTIVE</i> (1081) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM) Consistency with ISPM 1
79	The principles of necessity, managed risk, minimal impact, transparency harmonization, non-discrimination, technical justification, cooperation, <u>equivalence of phytosanitary measures</u> and <u>equivalence modification</u> , as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.	P	<i>Category : EDITORIAL</i> (908) PPPO (17 Sep 2023 1:13 PM) Should reflect more correctly the principles (refer to ISPM No. 1). PPPO suggests to insert 'of phytosanitary measures' after equivalence and 'and modification' after equivalence of phytosanitary measures.
79	The <u>basic</u> principles of necessity, managed risk, minimal impact, transparency harmonization, non-discrimination, technical justification, cooperation, and equivalence, as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.	P	<i>Category : TECHNICAL</i> (788) COSAVE (12 Sep 2023 7:15 PM) For consistency with ISPM 1
79	The <u>basic</u> principles of necessity, managed risk, minimal impact, transparency harmonization, non-discrimination, technical justification, cooperation, and equivalence, as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.	P	<i>Category : TECHNICAL</i> (633) Uruguay (7 Sep 2023 3:30 PM) For consistency with ISPM 1

79	The principles of necessity, managed risk, minimal impact, transparency harmonization, non-discrimination, technical justification, cooperation, and equivalence, as described in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) (WTO, 1994), are all essential considerations in pest risk analysis.	C	(159) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 9:57 PM] Black - This paragraph is new text
82	The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and <u>whether</u> pest risk management options to manage the associated pest <u>risk</u> <u>are required</u> . The identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk. The process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified.	P	<i>Category : EDITORIAL</i> (1681) Australia (29 Sep 2023 5:49 AM) revise text to improve clarity
82	The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and pest risk management options to manage the associated pest risk. The <u>identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk</u> . <u>The</u> process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, <u>while avoiding phytosanitary actions that are not technically justified</u> .	P	<i>Category : SUBSTANTIVE</i> (1371) European Union (26 Sep 2023 4:14 PM) The degree of uncertainty, proportionating the risk and technical justification have nothing to do with the impacts on biodiversity and environment - best to relate to the fact that PRA includes these factors and management may protect the environment and preserve biodiversity.
82	The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and pest risk management options to manage the associated pest risk. The identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk. The process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary <u>actions-measures</u> that are not technically justified.	P	<i>Category : TECHNICAL</i> (1370) European Union (26 Sep 2023 4:13 PM) Why "actions" ? "measures" is more appropriate here.

82	<p>The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and pest risk management options to manage the associated pest risk. The identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk. The process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified.</p>	<p>P Category : SUBSTANTIVE (1129) EPPO (26 Sep 2023 10:55 AM) The degree of uncertainty, proportionating the risk and technical justification have nothing to do with the impacts on biodiversity and environment - best to relate to the fact that PRA includes these factors and management may protect the environment and preserve biodiversity. In the sentence now proposed for deletion, why "actions" ? "measures" would be a more appropriate here</p>
82	<p>The PRA process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified. The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and pest risk management options to manage the associated pest risk. The identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk. The process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified.</p>	<p>P Category : TECHNICAL (789) COSAVE (12 Sep 2023 7:18 PM) Text deleted because does not fit well with the title of the section, it seems to be more appropriate as part of the scope</p>
82	<p>The PRA process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified. The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and pest risk management options to manage the associated pest risk. The identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk. The process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve</p>	<p>P Category : TECHNICAL (634) Uruguay (7 Sep 2023 3:33 PM) Text deleted because does not fit well with the title of the section, it seems to be more appropriate as part of the scope</p>

	biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified.		
82	<p>The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and pest risk management options to manage the associated pest risk. The identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk. The process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified.</p> <p><i>La norme fournit des orientations sur la manière de déterminer si un organisme nuisible satisfait aux critères pour être considéré comme un organisme nuisible de quarantaine et sur les options de gestion du risque phytosanitaire pour gérer le risque phytosanitaire associé. L'identification de ces options tient compte du degré d'incertitude et les options sont conçues proportionnellement au risque. Le processus comprend l'analyse des risques pour la biodiversité et l'environnement posés par les ravageurs. Les mesures phytosanitaires qui en résultent peuvent contribuer à protéger l'environnement et à préserver la biodiversité en gérant le risque phytosanitaire posé par les produits transportés à l'échelle internationale, tout en évitant les mesures phytosanitaires qui ne sont pas techniquement justifiées.</i></p>	P	<p>Category : SUBSTANTIVE (607) Burkina Faso (5 Sep 2023 8:30 AM) Ajouter "préserver la biodiversité indigènes ou locales</p>
82	<p>The standard provides guidance on how to determine whether a pest satisfies the criteria to be considered a quarantine pest and pest risk management options to manage the associated pest risk. The identification of these options takes account of the degree of uncertainty and the options are designed in proportion to the risk. The process includes analysis of risks to biodiversity and the environment posed by pests. The resulting phytosanitary measures may help protect the environment and preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, while avoiding phytosanitary actions that are not technically justified.</p>	C	<p>(160) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 9:57 PM] Black - This paragraph is new text</p>
85	1. Framework for PRA	C	<p>Category : TECHNICAL (790) COSAVE (12 Sep 2023 7:19 PM) We suggest to include the entire section in "outline of requirements" because is a summary of the content of the ISPM</p>

85	1. Framework for PRA	C	Category : TECHNICAL (635) Uruguay (7 Sep 2023 3:35 PM) We suggest to include the entire section in "outline of requirements" because is a summary of the content of the ISPM
86	The PRA process may be used for organisms not previously recognized as pests (such as plants, biological control agents and other beneficial organisms, and LMOs), recognized pests, pathways, and review of phytosanitary policy. The process can be summarized as follows:	C	Category : TECHNICAL (1799) Zambia (30 Sep 2023 11:10 PM) The inclusion of biocontrol agents, LMOs, and other beneficial organisms is vital in this standard.
86	The PRA process may be used for organisms not previously recognized as pests (such as plants, biological control agents and other beneficial organisms, and LMOs), recognized pests, pathways, and review of phytosanitary policy. The process can be summarized as follows:	C	Category : SUBSTANTIVE (1682) Australia (29 Sep 2023 5:50 AM) It is not clear if this is just referring to impacts specific to plant pests or if it also includes other organisms that may be associated with a plant commodity but are not strictly plant pests but still have impacts on the environment (e.g. hitchhiking ants etc). This clarification would improve clarity and understanding of the scope.
86	The PRA process may be used for organisms not previously recognized as pests (such as plants, biological control agents and other beneficial organisms, and LMOs), recognized pests, pathways, and <u>the</u> review of phytosanitary policy. The process can be summarized as follows:	P	Category : EDITORIAL (1372) European Union (26 Sep 2023 4:15 PM) Improved English.
86	The PRA process may be used for organisms not previously recognized as pests (such as plants, biological control agents and other beneficial organisms, and LMOs), recognized pests, pathways, and <u>the</u> review of phytosanitary policy. The process can be summarized as follows:	P	Category : EDITORIAL (1130) EPPO (26 Sep 2023 10:55 AM) Improved English
86	The PRA process may be used for organisms not previously recognized as pests (such as plants, biological control agents and other beneficial organisms, and LMOs), recognized pests, pathways, and review of phytosanitary policy. The <u>PRA</u> process <u>consist of three stages that</u> can be summarized as follows:	P	Category : TECHNICAL (791) COSAVE (12 Sep 2023 7:21 PM) For clarification
86	The PRA process may be used for organisms not previously recognized as pests (such as plants, biological control agents and other beneficial organisms, and LMOs), recognized pests, pathways, and review of phytosanitary policy. The <u>PRA</u> process <u>consists of three stages that</u> can be summarized as follows:	P	Category : TECHNICAL (777) Uruguay (8 Sep 2023 8:03 PM) For clarification
86	The PRA process may be used for organisms not previously recognized as pests	C	(161) Imported Comment (30 Jun 2023 3:20 PM)

	(such as plants, biological control agents and other beneficial organisms, and LMOs), recognized pests, pathways, and review of phytosanitary policy. The process can be summarized as follows:		[Originally made by M.Sai on 21 May 2023 5:51 PM] Black - This paragraph from ISPM2 is revised
88	<u>The PRA process is initiated in Stage 1, which</u> involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the identified PRA area. If no pests are identified in this stage, the analysis may stop.	P	Category : EDITORIAL (1683) Australia (29 Sep 2023 5:51 AM) suggested edit for consistency in language for all subpoints.
88	<u>The PRA process is initiated in Stage 41 (initiation), which</u> involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the <u>identified defined</u> PRA area. If no pests are identified <u>in-at</u> this stage, the analysis may stop. <u>At the end of Stage 1, pests have been identified individually or in association with a pathway.</u>	P	Category : TECHNICAL (1373) European Union (26 Sep 2023 4:18 PM) Improved clarity.
88	<u>The PRA process is initiated in Stage 1, which</u> <u>1 (initiation)</u> involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the <u>identified defined</u> PRA area. If no pests are identified <u>in-at</u> this stage, the analysis may stop. <u>At the end of Stage 1, pests have been identified individually or in association with a pathway.</u>	P	Category : TECHNICAL (1131) EPPO (26 Sep 2023 10:55 AM) Improved clarity
88	<u>Stage 1 (Initiation) The PRA process is initiated in Stage 1, which</u> involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the identified PRA area. If no pests are identified in this stage, the analysis may stop.	P	Category : EDITORIAL (1083) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM) For consistency with the following para
88	<u>The PRA process is initiated in Stage 1, which</u> involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the identified PRA area. If no pests are identified in this stage, the analysis may stop.	C	Category : EDITORIAL (1082) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM) Begin with stage 1 (initiation) for consistency.
88	<u>The PRA process is initiated in Stage 41 (initiation), which</u> involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the identified PRA area. If no pests are identified in this stage, the analysis may stop.	P	Category : EDITORIAL (909) PPPO (17 Sep 2023 1:13 PM) For consistency with subsequent bullet points.
88	<u>The PRA process is initiated in Stage 1</u> <u>Stage 1 (initiation)</u> , which involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the identified PRA area. If no pests are identified in this stage, the analysis may stop.	P	Category : TECHNICAL (792) COSAVE (12 Sep 2023 7:24 PM) For consistency with other stages
88	<u>The PRA process is initiated in Stage 41 (initiation)</u> , which involves identifying the	P	Category : TECHNICAL

	pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the identified PRA area. If no pests are identified in this stage, the analysis may stop.		(636) Uruguay (7 Sep 2023 3:37 PM) For consistency with other stages
88	The PRA process is initiated in Stage 4,1 (initiation) which involves identifying the pest (or pests) and pathways that are of potential concern and that should be considered for pest risk assessment in relation to the identified PRA area. If no pests are identified in this stage, the analysis may stop.	P	<i>Category : EDITORIAL</i> (575) United States of America (25 Aug 2023 5:49 PM) for consistency with other paras below
89	Stage 2 (pest risk assessment) begins with the categorization of individual pests to determine whether the criteria for a quarantine pest are satisfied. If no pests meet the criteria, the analysis may stop. Pest risk assessment continues with an evaluation of the probability of pest entry, establishment and spread, and of their potential consequences to determine whether pest risk is acceptable or not.	P	<i>Category : EDITORIAL</i> (1684) Australia (29 Sep 2023 5:54 AM) provide clarity of purpose of stages and how each stage connects.
89	Stage 2 (pest risk assessment) begins with the pest categorization of individual pests to determine whether the criteria for pest has or has not the characteristics of a quarantine pest are satisfied. pest. If no pests meet pest has the criteria characteristics of a quarantine pest, the analysis PRA may stop. Pest If a pest has the characteristics of a quarantine pest, the pest risk assessment stage continues with an evaluation of the probability of pest entry, establishment and spread, and of their the potential consequences.	P	<i>Category : TECHNICAL</i> (1374) European Union (26 Sep 2023 4:19 PM) Redrafted to ensure the term "pest categorization", which is defined in ISPM 5 (the glossary), is used.
89	Stage 2 (pest risk assessment) begins with the categorization of individual pests to determine whether the criteria for a quarantine pest are satisfied. If no pests meet the criteria, the analysis may stop. Pest risk assessment continues with an evaluation of the probability of pest entry, establishment and spread, and of their potential consequences. Stage 2 (pest risk assessment) begins with the pest categorization of individual pests to determine whether the pest has or has not the characteristics of a quarantine pest. If no pest has the characteristics of a quarantine pest the PRA may stop. If a pest has the characteristics of a quarantine pest the pest risk assessment stage continues with an evaluation of the probability of pest entry, establishment and spread, and of the potential consequences	P	<i>Category : TECHNICAL</i> (1132) EPPO (26 Sep 2023 10:55 AM) Redrafted to ensure the term "pest categorization", which is defined in ISPM 5 (the glossary), is used.
89	Stage 2 (pest risk assessment) begins with the categorization of individual pests to determine whether the criteria for a quarantine pest are satisfied. If no pests meet the criteria, the analysis may stop. Pest risk assessment continues with an	P	<i>Category : SUBSTANTIVE</i> (910) PPPO (17 Sep 2023 1:13 PM) To provide boundary of risk reduction.

	evaluation of the probability of pest entry, establishment and spread, and of their potential <u>consequences</u> <u>consequences to determine whether the pest risk is acceptable or not.</u>		
89	Stage 2 (pest risk assessment) begins with the categorization of individual pests to determine whether the criteria for a quarantine pest are satisfied. If no pests meet the criteria, the analysis may stop. Pest risk assessment continues with an evaluation of the probability of pest entry, establishment and spread, and of their potential <u>economic</u> consequences.	P	<i>Category : SUBSTANTIVE (793) COSAVE (12 Sep 2023 7:24 PM)</i> See general comment
89	Stage 2 (pest risk assessment) begins with the categorization of individual pests to determine whether the criteria for a quarantine pest are satisfied. If no pests meet the criteria, the analysis may stop. Pest risk assessment continues with an evaluation of the probability of pest entry, establishment and spread, and of their potential <u>economic</u> consequences.	P	<i>Category : SUBSTANTIVE (637) Uruguay (7 Sep 2023 3:38 PM)</i> See general comment
89	Stage 2 (pest risk assessment) begins with the categorization of individual pests to determine whether the criteria for a quarantine pest are satisfied. If no pests meet the criteria, the analysis may stop. Pest risk assessment continues <u>to those fit for the criteria of quarantine pest</u> with an evaluation of the probability of pest entry, establishment and spread, and of their potential consequences.	P	<i>Category : SUBSTANTIVE (581) Mozambique (29 Aug 2023 3:07 PM)</i> For more clarity, we propose the addition of the sentence (to those fit for the criteria of quarantine pest) on the third line of the paragraph, after the word continues
90	Stage 3 (pest risk management) involves identification, evaluation and selection of appropriate phytosanitary measures to reduce the pest risk posed by the quarantine pests identified at Stage <u>22 to an acceptable level</u> .	P	<i>Category : EDITORIAL (1685) Australia (29 Sep 2023 5:54 AM)</i> provide clarity of purpose of stages and how each stage connects.
90	Stage 3 (pest risk management) involves identification, evaluation and selection of appropriate <u>options for</u> phytosanitary measures to reduce the pest risk posed by the quarantine pests identified at Stage 2.	P	<i>Category : TECHNICAL (1375) European Union (26 Sep 2023 4:21 PM)</i> More appropriate language.
90	Stage 3 (pest risk management) involves identification, evaluation and selection of appropriate <u>options for</u> phytosanitary measures to reduce the pest risk posed by the quarantine pests identified at Stage 2.	P	<i>Category : TECHNICAL (1133) EPPO (26 Sep 2023 10:55 AM)</i> More appropriate terminology
90	Stage 3 (pest risk management) involves identification, evaluation and selection of appropriate phytosanitary measures to reduce the pest risk posed by the quarantine pests identified at Stage <u>22 to an acceptable level of risk</u> .	P	<i>Category : SUBSTANTIVE (911) PPPO (17 Sep 2023 1:13 PM)</i> To provide boundary of risk reduction as per IPPC understanding.
90	Stage 3 (pest risk management) involves identification, evaluation and selection of appropriate <u>phytosanitary measures-pest risk management options</u> to reduce the pest risk posed by the quarantine pests identified at Stage 2.	P	<i>Category : TECHNICAL (794) COSAVE (12 Sep 2023 7:26 PM)</i> For consistency. Pest risk management options identified in Stage 3 form the basis

			of phytosanitary measures
90	Stage 3 (pest risk management) involves identification, evaluation and selection of appropriate <u>phytosanitary measures</u> <u>pest risk management options</u> to reduce the pest risk posed by the quarantine pests identified at Stage 2.	P	Category : TECHNICAL (638) Uruguay (7 Sep 2023 3:40 PM) For consistency. Pest risk management options identified in Stage 3 form the basis of phytosanitary measures
90	Stage 3 (pest risk management) involves identification, <u>evaluation</u> <u>evaluation</u> , and selection of appropriate phytosanitary measures to reduce the pest risk posed by the quarantine pests identified at Stage 2.	P	Category : EDITORIAL (576) United States of America (25 Aug 2023 5:49 PM) for consistency - see comment about commas above
91	Pest risk analysis, however, is not necessarily a linear process because, in conducting the entire analysis, it may be necessary to go back and forth between various stages. Information gathering, documentation and pest risk communication are carried out throughout the PRA process. <u>PRA can be undertaken by either the national plant protection organization (NPPO) of the importing country or the export country. The NPPO of the importing country however, is responsible for providing the technical justification for phytosanitary import requirements for quarantine pest with the international movement of the consignments.</u>	P	Category : SUBSTANTIVE (1715) Mexico (29 Sep 2023 10:42 PM) PRA is usually done by the importing NPPO, but it could be done by anyone. The key point is that the importing country is responsible for justifying its decisions with a PRA
91	Pest risk analysis, however, is not necessarily a linear process because, in conducting the entire analysis, it may be necessary to go back and forth between various stages. Information <u>gathering</u> , <u>gathering</u> documentation and pest risk communication are carried out throughout the PRA process.	P	Category : EDITORIAL (1687) Australia (29 Sep 2023 5:56 AM) typo
91	Pest risk analysis, however, is not necessarily a linear process because, in conducting the entire analysis, it may be necessary to go back and forth between various stages. Information gathering, documentation and pest risk communication are carried out throughout the PRA process.	C	(162) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:51 PM] Black - This paragraph from ISPM2 is revised
93	General requirements for the PRA process and aspects common to all PRA stages (e.g. information, gathering, documentation, pest risk communication) are provided in the core text of this standard and detailed guidance on each stage of PRA is given in Annexes 1, 2 and 3, respectively. Detailed guidance on <u>assessing</u> environmental risks, LMOs and plants as pests is given in Annexes 4, 5 and 6, respectively.	P	Category : EDITORIAL (1686) Australia (29 Sep 2023 5:55 AM) verb missing, as guidance is on the assessment of environmental risk rather than guidance on environmental risk.
93	General requirements for the PRA process and aspects common to all PRA stages	P	Category : TECHNICAL (1376) European Union (26 Sep 2023

	(e.g. information, gathering, documentation, pest risk communication) are provided in the core text of this <u>standard and detailed standard</u> . <u>Detailed</u> guidance on <u>each stage of PRA-initiation, pest risk assessment and pest risk management</u> is given in Annexes 1, 2 and 3, <u>respectively</u> . Detailed guidance on environmental risks, LMOs and plants as pests is given in Annexes 4, 5 and 6, respectively.		4:22 PM) Improved clarity.
93	General requirements for the PRA process and aspects common to all PRA stages (e.g. information, gathering, documentation, pest risk communication) are provided in the core text of this <u>standard and detailed standard</u> . <u>Detailed</u> guidance on <u>each stage of PRA-initiation, pest risk assessment and pest risk management</u> is given in Annexes 1, 2 and 3, <u>respectively</u> . Detailed guidance on environmental risks, LMOs and plants as pests is given in Annexes 4, 5 and 6, respectively.	P	<i>Category : TECHNICAL</i> (1134) EPPO (26 Sep 2023 10:55 AM) Improved clarity
93	General requirements for the PRA process and aspects common to all PRA stages (e.g. information, gathering, documentation, pest risk communication) are provided in the core text of this standard and detailed guidance on each stage of PRA is given in Annexes 1, 2 and 3, respectively. Detailed guidance on environmental risks, LMOs and plants as pests is given in Annexes 4, 5 and 6, respectively.	C	(163) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:52 PM] Black - This paragraph from ISPM2 is revised
95	An overview of the full PRA process is illustrated in Appendix 1.	C	(164) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:52 PM] Black - This paragraph from ISPM2 is revised
97	This standard is not a detailed operational or methodological guide for assessors.	P	<i>Category : SUBSTANTIVE</i> (1653) China (28 Sep 2023 2:54 AM) delete this paragraph. This standard reorganization can also be applied by the academic community, which can further standardize the process of risk analysis. It is recommended to delete this paragraph.
97	This standard is not a detailed operational or methodological guide for assessors.	P	<i>Category : TECHNICAL</i> (1377) European Union (26 Sep 2023 4:23 PM) Irrelevant, not necessary and not appropriate here.
97	This standard is not a detailed operational or methodological guide for assessors.	P	<i>Category : TECHNICAL</i> (1135) EPPO (26 Sep 2023 10:55 AM) Irrelevant, not necessary and not appropriate here.
97	This standard is not a detailed operational or methodological guide for assessors.	P	<i>Category : SUBSTANTIVE</i> (1097) APPPC (26 Sep 2023 10:36 AM) Delete this paragraph. This paragraph is of

			little significance. This standard reorganization can also be applied by the academic community, which can further standardize the process of risk analysis.
97	This standard <u>provides general guidance for PRA methodology and</u> is not <u>intended as a detailed operational or methodological guide implementation tool</u> for <u>assessors risk assessors and managers</u> .	P	Category : TECHNICAL (577) United States of America (25 Aug 2023 5:53 PM) to clarify the intention of the standard vs. implementation material.
97	This standard is not a detailed operational or methodological guide for assessors.	C	(165) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:52 PM] Black - This paragraph from ISPM2 is revised
99	2. Aspects common to all PRA stages	C	Category : SUBSTANTIVE (1656) China (28 Sep 2023 3:00 AM) Suggest placing "3. Scope of PRA" (paragraph no.170-181) before "2. Aspects common to all PRA stages" (paragraph no.99). Introducing "scope of PRA" after "framework for PRA" is logically more reasonable.
99	2. Aspects common to all PRA stages	C	Category : SUBSTANTIVE (1041) Canada (22 Sep 2023 8:24 PM) A paragraph should be added here to refer to the report that is being developed by the IPPC Focus Group on Climate Change and Phytosanitary Issues which provides technical and operational advice to support NPPOs and RPPOs to effectively assess and manage the phytosanitary risks of climate change on plant pests. The report contains content directly relevant to PRA. Alternatively if deemed not to be appropriate to include a reference to the report, some of its key points could be added to the revised PRA standard (e.g.. guidance on when to cover climate change in PRAs, adding expiring dates to PRAs, conducting PRAs on groups of organisms or on pathways when feasible to increase efficiency, etc.)
100	2.1 Information gathering	P	Category : EDITORIAL (1098) APPPC (26 Sep 2023 10:36 AM)

100	2.1 Information gathering	C	Category : TECHNICAL (795) COSAVE (12 Sep 2023 7:27 PM) As per general comment, we suggest to consider the inclusion of Section 2 of Annex 4 in this section.
100	2.1 Information gathering	C	Category : TECHNICAL (639) Uruguay (7 Sep 2023 3:41 PM) As per general comment, we suggest to consider the inclusion of Section 2 of Annex 4 in this section.
101	<u>Information gathering is an essential element of all stages of PRA. It is important at the initiation stage, for example to clarify the identity of the pest(s), its/their present distribution and association with host plants or commodities. Throughout the PRA process, information should be gathered and analysed as required to reach recommendations and conclusions. Information for PRA may come from a variety of sources.</u> Scientific publications as well as technical information such as data from surveys and interceptions may be relevant. As the analysis progresses, information gaps may be identified necessitating further enquiries or research. Where information is insufficient or inconclusive, expert judgement may be used if appropriate.	P	Category : TECHNICAL (1378) European Union (26 Sep 2023 4:25 PM) Improved accuracy and clarity.
101	<u>Information gathering is an essential element of all stages of PRA. It is important at the initiation stage, for example to clarify the identity of the pest(s), its/their present distribution and association with host plants or commodities. Throughout the PRA process, information should be gathered and analysed as required to reach recommendations and conclusions. Information for PRA may come from a variety of sources.</u> Scientific publications as well as technical information such as data from surveys and interceptions may be relevant. As the analysis progresses, information gaps may be identified necessitating further enquiries or research. Where information is insufficient or inconclusive, expert judgement may be used if appropriate.	P	Category : TECHNICAL (1136) EPPO (26 Sep 2023 10:55 AM) Improved accuracy and clarity
101	Throughout the process, information should be gathered and analysed as required to reach recommendations and conclusions. Scientific publications as well as technical information such as data from surveys and interceptions may be relevant. As the analysis progresses, information gaps may be identified necessitating further enquiries or research. Where information is insufficient or inconclusive, expert judgement may be used if appropriate.	C	(166) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:50 PM] Blue – this paragraph is from section3.2 of ISPM2
103	Cooperation in the provision of information and responding to requests for information made via the official contact point are IPPC obligations	C	(167) Imported Comment (30 Jun 2023 3:20 PM)

	(Articles VIII.1(c) and VIII.2). When requesting information from other contracting parties, requests should be as specific as possible and limited to information essential to the analysis. Other agencies may be approached for information appropriate to the analysis.		[Originally made by M.Sai on 21 May 2023 5:51 PM] Blue – this paragraph is from section3.2 of ISPM2
105	2.2 Uncertainty <u>'The conclusions of a PRA are likely to become more uncertain over time due to changes in trade patterns, climate change and the international spread of the pest.'</u>	P	<i>Category : TECHNICAL</i> (1379) European Union (26 Sep 2023 4:26 PM) We suggest adding that the conclusions of a PRA are likely to become more uncertain due to important factors, including changes in trade patterns and climate change. Likewise, another important point impacting uncertainty is the international spread of the pest.
105	2.2 Uncertainty	C	<i>Category : TECHNICAL</i> (796) COSAVE (12 Sep 2023 7:27 PM) As per general comment consider to include section 5 of annex 4 in this section
105	2.2 Uncertainty	C	<i>Category : TECHNICAL</i> (640) Uruguay (7 Sep 2023 3:43 PM) As per general comment consider to include section 5 of annex 4 in this section
106	<u>Uncertainty is a component of risk and risk. PRA often involves some estimation based on an extrapolation from the situation where the pest occurs to the hypothetical situation in the PRA area. It is therefore important to recognize and document uncertainty when performing PRAs. Sources of uncertainty with a particular PRA may include missing, incomplete, inconsistent or conflicting data; natural variability of biological systems; subjectiveness of analysis; and sampling randomness. Symptoms of uncertain causes and origin and asymptomatic carriers of pests may pose particular challenges.</u>	P	<i>Category : TECHNICAL</i> (1380) European Union (26 Sep 2023 4:29 PM) Improved accuracy and clarity.
106	<u>Uncertainty is a component of risk and therefore it risk. PRA often involves some estimation based on an extrapolation from the situation where the pest occurs to the hypothetical situation in the PRA area. It is therefore important to recognize and document uncertainty when performing PRAs. Sources of uncertainty with a particular PRA may include missing, incomplete, inconsistent or conflicting data; natural variability of biological systems; subjectiveness of analysis; and sampling randomness. Symptoms of uncertain causes and origin and asymptomatic carriers of pests may pose particular challenges.</u>	P	<i>Category : TECHNICAL</i> (1137) EPPO (26 Sep 2023 10:55 AM) Improved accuracy and clarity

106	<p>Uncertainty is a component of risk and therefore it is important to recognize and document uncertainty when performing PRAs. Sources of uncertainty with a particular PRA may include missing, incomplete, inconsistent or conflicting data; natural variability of biological systems; subjectiveness of analysis; and sampling randomness. Symptoms of uncertain causes and origin and asymptomatic carriers of pests may pose particular challenges.</p>	C	<p>(168) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:50 PM] Blue - the paragraph is from section3.1 of ISPM2</p>
108	<p>The nature and degree of uncertainty in the analysis should be documented and communicated, and the use of expert judgement should be clearly indicated. If adding or strengthening of phytosanitary measures is recommended to compensate for uncertainty, this should be recorded. Documentation of uncertainty contributes to transparency and may also be useful for the identification of research needs or priorities.</p>	C	<p>(169) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:50 PM] Blue - the paragraph is from section3.1 of ISPM2</p>
110	<p>As uncertainty is an inherent part of PRA, it is appropriate to monitor the phytosanitary situation resulting from the regulation based on any particular PRA and to re-evaluate previous decisions.</p> <p><u>The conclusions of a PRA are likely to become more uncertain over time due to changes in trade patterns, climate change and the international spread of the pest.'</u></p>	P	<p>Category : TECHNICAL (1138) EPPO (26 Sep 2023 10:55 AM) We suggest adding that the conclusions of a PRA are likely to become more uncertain due to important factors, including changes in trade patterns and climate change. Likewise, another important point impacting uncertainty is the international spread of the pest.</p>
110	<p>As uncertainty is an inherent part of PRA, it is appropriate to monitor the phytosanitary situation resulting from the regulation based on any particular PRA and to re-evaluate previous decisions.</p>	C	<p>(170) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:50 PM] Blue - the paragraph is from section3.1 of ISPM2</p>
113	<p>The principle of transparency requires that contracting parties should, on request, make available the technical justification for phytosanitary import requirements. Thus, the PRA should be sufficiently documented. This may be achieved by documenting PRA at two levels:</p>	C	<p>(171) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.3 of ISPM2</p>
116	<p>documenting each <u>analysis made</u>each specific PRA.</p>	P	<p>Category : SUBSTANTIVE (1654) China (28 Sep 2023 2:55 AM) keep in line with 2.3.2</p>
116	<p>documenting each <u>analysis made</u>specific PRA.</p>	P	<p>Category : TECHNICAL (797) COSAVE (12 Sep 2023 7:29 PM) For consistency with title of section 2.3.2</p>
116	<p>documenting each <u>analysis made</u>specific PRA.</p>	P	<p>Category : TECHNICAL (641) Uruguay (7 Sep 2023 3:44 PM) For consistency with title of section 2.3.2</p>

118	Each national plant protection organization (NPPO) may document the procedures and criteria of its general PRA process.	C	(172) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.1 of ISPM2
121	For each <u>particular-specific</u> analysis, the entire process from initiation to pest risk management should be sufficiently documented so that the sources of information and the rationale for management decisions can be clearly demonstrated. However, a PRA does not necessarily need to be long and complex. A short and concise PRA may be sufficient provided justified conclusions can be reached after completing only a limited number of steps in the PRA process.	P	<i>Category : EDITORIAL</i> (1655) China (28 Sep 2023 2:56 AM)
121	For each particular <u>analysisPRA</u> , the entire process from initiation to pest risk management should be sufficiently documented so that the sources of information and the rationale for management decisions can be clearly demonstrated. <u>However, a</u> PRA does not necessarily need to be long and complex. A short and concise PRA may be sufficient provided justified conclusions can be reached after completing only a limited number of steps in the PRA process.	P	<i>Category : TECHNICAL</i> (1381) European Union (26 Sep 2023 4:30 PM) Improved accuracy and clarity (see our general comment on this issue).
121	For each particular <u>analysisPRA</u> , the entire process from initiation to pest risk management should be sufficiently documented so that the sources of information and the rationale for management decisions can be clearly demonstrated. <u>However, a</u> PRA does not necessarily need to be long and complex. A short and concise PRA may be sufficient provided justified conclusions can be reached after completing only a limited number of steps in the PRA process.	P	<i>Category : TECHNICAL</i> (1139) EPPO (26 Sep 2023 10:55 AM) Improved accuracy and clarity (see our general comment on this issue)
121	For each particular analysis, the entire process from initiation to pest risk management should be sufficiently documented so that the sources of information and the rationale for management decisions can be clearly demonstrated. However, a PRA does not necessarily need to be long and complex. A short and concise PRA may be sufficient provided justified conclusions can be reached after completing only a limited number of steps in the PRA process.	C	<i>Category : SUBSTANTIVE</i> (912) PPPO (17 Sep 2023 1:13 PM) If the PRA process does not need to be long and complex, reciprocally it would be good to have a more concise standard. Therefore, the standard in its current form needs to be reviewed.
121	For each particular <u>analysisPRA</u> , the entire process from initiation to pest risk management should be sufficiently documented so that the sources of information and the rationale for management decisions can be clearly demonstrated. However, a PRA does not necessarily need to be long and complex. A short and concise PRA may be sufficient provided justified conclusions can be reached after completing only a limited number of steps in the PRA process.	P	<i>Category : TECHNICAL</i> (642) Uruguay (7 Sep 2023 3:46 PM) For consistency

121	For each particular analysis, the entire process from initiation to pest risk management should be sufficiently documented so that the sources of information and the rationale for management decisions can be clearly demonstrated. However, a PRA does not necessarily need to be long and complex. A short and concise PRA may be sufficient provided justified conclusions can be reached after completing only a limited number of steps in the PRA process.	C	(173) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.2 of ISPM2
123	The main elements that <u>should-may</u> be documented are:	P	<i>Category : SUBSTANTIVE</i> (1658) China (28 Sep 2023 3:08 AM) Consistent with the original text of ISPM2, the following content may not be included in every risk analysis report
123	The main elements that should be documented are: <u>- geographical distribution;</u>	P	<i>Category : TECHNICAL</i> (1382) European Union (26 Sep 2023 4:35 PM) Geographical distribution of the organism should be added as a bullet point. Possibly it is meant to be part of the biological attributes, but this is not clear and it is an essential element of a PRA.
123	The main elements that should be documented are: <u>- Geographical distribution</u>	P	<i>Category : TECHNICAL</i> (1140) EPPO (26 Sep 2023 10:55 AM) Geographical distribution of the organism should be added as a bullet point. Possibly it is meant to be part of the biological attributes, but this is not clear and it is an essential element of a PRA.
123	The main elements that should be documented are:	C	(174) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.2 of ISPM2
128	biological attributes of the organism and evidence of ability to cause <u>injury</u> <u>damage</u> ;	P	<i>Category : EDITORIAL</i> (1383) European Union (26 Sep 2023 4:36 PM) Same comment as in paragraph 76 (see our general comment on this issue).
128	biological attributes of the organism and evidence of ability to cause <u>injury</u> <u>damage</u> ;	P	<i>Category : EDITORIAL</i> (1141) EPPO (26 Sep 2023 10:55 AM) Same comment as in paragraph 76 (see our general comment on this issue)
129	pest, pathways, endangered area;	P	<i>Category : EDITORIAL</i> (1384) European Union (26 Sep 2023 4:36 PM)

			The organism is already mentioned in paragraph 126 and 128.
129	pest, pathways, endangered area;	P	<i>Category : EDITORIAL (1142) EPPO (26 Sep 2023 10:55 AM)</i> The organism is already mentioned in paragraph 126 and 128
133	evidence of economic impact, which includes environmental impact;consequences;	P	<i>Category : EDITORIAL (1385) European Union (26 Sep 2023 4:37 PM)</i> For consistency with the editorial line declared at the beginning for this standard We suggest removing specific mention of economic and environmental impact (i.e. just say "evidence of consequences" (see our general comment on this issue).
133	evidence of economic impact, which includes environmental impact;consequences	P	<i>Category : EDITORIAL (1143) EPPO (26 Sep 2023 10:55 AM)</i> For consistency with the editorial line declared at the beginning for this standard We suggest removing specific mention of economic and environmental impact (i.e. just say "evidence of consequences" (see our general comment on this issue).
135	decisions and justifications to stop the PRA processprocess where appropriate;	P	<i>Category : EDITORIAL (1386) European Union (26 Sep 2023 4:38 PM)</i> Clarity.
135	decisions and justifications to stop the PRA processprocess where appropriate;	P	<i>Category : EDITORIAL (1144) EPPO (26 Sep 2023 10:55 AM)</i> clarity
136	options for phytosanitary measures identified, evaluated and recommended from pest risk management; and	P	<i>Category : TECHNICAL (1387) European Union (26 Sep 2023 4:39 PM)</i> More appropriate terminology.
136	options for phytosanitary measures identified, evaluated and recommended from pest risk management; and	P	<i>Category : TECHNICAL (1145) EPPO (26 Sep 2023 10:55 AM)</i> More appropriate terminology
136	pest risk management options identified and phytosanitary measures identified, evaluated and the phytosanitary measures recommended from pest risk management; and	P	<i>Category : TECHNICAL (798) COSAVE (12 Sep 2023 7:32 PM)</i> To clarify
136	phytosanitary measures identified, pest risk management options identified and evaluated and the phytosanitary measures recommended from pest risk management; and	P	<i>Category : TECHNICAL (643) Uruguay (7 Sep 2023 3:49 PM)</i> To clarify

138	Other aspects to be documented may include:	C	(175) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.2 of ISPM2
140	any particular need for monitoring the efficacy or effectiveness of proposed phytosanitary measures; and	P	<i>Category : TECHNICAL</i> (644) Uruguay (7 Sep 2023 3:52 PM) Keep wording of current ISPM 2. According with IPPC style guide, the generally accepted understanding is that efficacy refers to measurable results under controlled conditions, whereas effectiveness is the degree to which something is successful in producing the desired results
141	potential dangers identified that are outside the scope of the IPPC and are to be communicated to other authorities (e.g. biological control agents) <u>plant pests that are also harmful to human health</u>). ¹	P	<i>Category : TECHNICAL</i> (1389) European Union (26 Sep 2023 4:42 PM) This is a better example and also biological controls agents fall under ISPM3 and are often the responsibility of the NPPO.
141	potential dangers identified that are outside the scope of the IPPC and are to be communicated to other authorities (e.g. biological control agents). ¹	C	<i>Category : TECHNICAL</i> (1388) European Union (26 Sep 2023 4:41 PM) Potential dangers: in the previous text the term 'hazard' was used, whereas throughout the text the term danger has now been chosen. In risk analysis theory, hazard and danger concepts have specific definitions. A risk exists if there is a potential damage, named also 'hazard'. The definition of a risk involves some kind of loss or damage that might be received and the uncertainty of its transformation in actual loss or damage. A danger is then defined as the accident initiator which have a probability of occurrence not equal to zero and which can give rise to significant consequences. More general, it would be good to check the consistency of replacing 'hazard' throughout the text in which cases the formulation 'danger' is most appropriate.
141	potential dangers identified that are outside the scope of the IPPC and are to be communicated to other authorities (e.g. biological control agents). ¹	C	<i>Category : TECHNICAL</i> (1147) EPPO (26 Sep 2023 10:55 AM) Potential dangers: in the previous text the term 'hazard' was used, whereas throughout

			the text the term danger has now been chosen. In risk analysis theory, hazard and danger concepts have specific definitions. A risk exists if there is a potential damage, named also 'hazard'. The definition of a risk involves some kind of loss or damage that might be received and the uncertainty of its transformation in actual loss or damage. A danger is then defined as the accident initiator which have a probability of occurrence not equal to zero and which can give rise to significant consequences. More general, it would be good to check the consistency of replacing 'hazard' throughout the text in which cases the formulation 'danger' is most appropriate.
141	potential dangers identified that are outside the scope of the IPPC and are to be communicated to other authorities (e.g. biological control agents) <u>plant pests that are also harmful to human health.¹</u>	P	<i>Category : TECHNICAL (1146) EPPO (26 Sep 2023 10:55 AM)</i> This is a better example and also biological controls agents fall under ISPM3 and are often the responsibility of the NPPO
144	Pest risk communication is important throughout each stage of PRA. It is generally recognized as an interactive process allowing exchange of information between the NPPO that has conducted <u>conducting</u> the PRA and stakeholders. It is not simply a one-way movement of information or about making stakeholders understand the <u>pest</u> risk situation, but is meant to reconcile the views of scientists, stakeholders, politicians and so on, in order to:	P	<i>Category : TECHNICAL (1390) European Union (26 Sep 2023 4:44 PM)</i> More appropriate tense and term. 'So on' is not appropriate for a Standard.
144	Pest risk communication is important throughout each stage of PRA. It is generally recognized as an interactive process allowing exchange of information between the NPPO that has conducted <u>conducting</u> the PRA and stakeholders. It is not simply a one-way movement of information or about making stakeholders understand the <u>pest</u> risk situation, but is meant to reconcile the views of scientists, stakeholders, politicians and so on, in order to:	P	<i>Category : TECHNICAL (1148) EPPO (26 Sep 2023 10:55 AM)</i> More appropriate tense and term. 'So on' is not appropriate for a Standard.
144	Pest risk communication is important throughout each stage of PRA. It is generally recognized as an interactive process allowing exchange of information between the NPPO that has conducted the PRA and stakeholders. It is not simply a one-way movement of information or about making stakeholders understand the risk situation, but is meant to reconcile the views of scientists, stakeholders, politicians and so on, in order to:	C	(176) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:47 PM] Blue – this paragraph is from section3.4 of ISPM2

147	<u>develop credible and feasible pest risk management options;</u>	P	Category : TECHNICAL (1391) European Union (26 Sep 2023 4:45 PM) The options need not only be credible, but also be feasible.
147	<u>develop credible and feasible pest risk management options;</u>	P	Category : TECHNICAL (1344) EPPO (26 Sep 2023 11:33 AM) The options need not only be credible, but also be feasible.
150	<u>At the end of the PRA, evidence supporting the PRA, the proposed mitigations and the uncertainties should preferably be communicated to the affected NPPOs and may be communicated to other interested parties, including other contracting parties, regional plant protection organizations and NPPOs, as appropriate.</u>	P	Category : SUBSTANTIVE (1659) China (28 Sep 2023 3:09 AM) ISPM 2 original saying 'At the end of the PRA, evidence supporting the PRA, the proposed mitigations and uncertainties should preferably be communicated to stakeholders and other interested parties, including other contracting parties, RPPOs and NPPOs, as appropriate.'
150	<u>AtEvidence supporting the PRA, the proposed mitigations and the uncertainties should be communicated to the affected NPPOs and may be communicated to other interested parties, including other contracting parties, regional plant protection organizations and NPPOs, as appropriate. the end of the PRA, evidence supporting the PRA, the proposed mitigations and the uncertainties should be communicated to the affected NPPOs and may be communicated to other interested parties, including other contracting parties, regional plant protection organizations and NPPOs, as appropriate.</u>	P	Category : EDITORIAL (1392) European Union (26 Sep 2023 4:47 PM) Improved drafting.
150	<u>EAvidence supporting the PRA, the proposed mitigations and the uncertainties should be communicated to the affected NPPOs and may be communicated to other interested parties, including other contracting parties, regional plant protection organizations and NPPOs, as appropriate. the end of the PRA, evidence supporting the PRA, the proposed mitigations and the uncertainties should be communicated to the affected NPPOs and may be communicated to other interested parties, including other contracting parties, regional plant protection organizations and NPPOs, as appropriate.</u>	P	Category : EDITORIAL (1149) EPPO (26 Sep 2023 10:55 AM) Improved drafting
150	<u>At the end of the PRA, evidence supporting the PRA, the proposed mitigations and the uncertainties should be communicated to the affected NPPOs and may be communicated to other interested parties, including other contracting parties, regional plant protection organizations and NPPOs, as appropriate.</u>	C	(177) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.4 of ISPM2

152	If, subsequent to the PRA, phytosanitary import requirements or prohibitions are adopted, the contracting party shall immediately publish these and notify contracting parties that it believes may be directly affected (according to IPPC Article VII.2(b)) and on request make the rationale available to any contracting party (according to IPPC Article VII.2(c)).	C	(178) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.4 of ISPM2
154	If, subsequent to the PRA, phytosanitary import requirements or prohibitions are not adopted, contracting parties may make this information available.	C	<i>Category : EDITORIAL</i> (1394) European Union (26 Sep 2023 4:51 PM) Implementation issue - it may be helpful to have guidance regarding how information should be made available.
154	If, subsequent to the PRA, phytosanitary import requirements or prohibitions are not adopted, contracting parties may make this information available.	C	<i>Category : TECHNICAL</i> (1393) European Union (26 Sep 2023 4:51 PM) This is part of WTO. Should a reference be made here?
154	If, subsequent to the PRA, phytosanitary import requirements or prohibitions are not adopted, contracting parties may make this information available.	C	<i>Category : TECHNICAL</i> (1151) EPPO (26 Sep 2023 10:55 AM) This is part of WTO. Should a reference be made here?
154	If, subsequent to the PRA, phytosanitary import requirements or prohibitions are not adopted, contracting parties may make this information available.	C	<i>Category : EDITORIAL</i> (1150) EPPO (26 Sep 2023 10:55 AM) Implementation issue - it may be helpful to have guidance regarding how information should be made available
154	If, subsequent to the PRA, phytosanitary import requirements or prohibitions are not adopted, contracting parties may make this information available.	C	(179) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.4 of ISPM2
156	National plant protection organizations are encouraged to communicate evidence of dangers other than pest risk (such as to animals or human health) to the appropriate authorities. NPPOs are encouraged to communicate evidence of dangers other than pest risk (such as to animals or human health) to the appropriate authorities.	P	<i>Category : EDITORIAL</i> (1395) European Union (26 Sep 2023 4:53 PM) See general comment.
156	National plant protection organizations are encouraged to communicate evidence of dangers other than pest risk (such as to animals or human health) to the appropriate authorities. NPPOs are encouraged to communicate evidence of dangers other than pest risk (such as to animals or human health) to the appropriate authorities.	P	<i>Category : EDITORIAL</i> (1152) EPPO (26 Sep 2023 10:55 AM) see general comment
156	National plant protection organizations are encouraged to communicate evidence of dangers other than pest risk (such as to animals or human health) to the	C	(180) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023

	appropriate authorities.		5:48 PM] Blue – this paragraph is from section3.4 of ISPM2
159	<u>It is recommended that an NPPO strives for consistency in its conduct of PRAs. Consistency offers numerous benefits, including:</u> National plant protection organizations should strive for consistency in their conduct of PRAs. Consistency offers numerous benefits, including:	P	Category : SUBSTANTIVE (1660) China (28 Sep 2023 3:10 AM) ISPM2 original saying: It is recommended that an NPPO strives for consistency in its conduct of PRAs. Consistency offers numerous benefits, including: . It may be impossible to maintain consistency due to the update of risk analysis techniques, such as changing from qualitative to quantitative, and changes in quantitative models. So it turned out to be recommended instead of should.
159	National plant protection organizations should strive for consistency in their conduct of PRAs. Consistency offers numerous benefits, including:	C	(181) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:46 PM] Blue – this paragraph is from section3.5 of ISPM2
164	improved comparability between PRAs conducted on similar products or pests through improved reliability of scoring, which in turn aids the development and application of similar or equivalent pest management measures.	P	Category : EDITORIAL (1396) European Union (26 Sep 2023 4:54 PM) 1) To clarify, we refer to scoring probability at the different stages of the PRA; 2) More precise wording.
164	improved comparability between PRAs conducted on similar products or pests through improved reliability of scoring, which in turn aids the development and application of similar or equivalent pest management measures.	P	Category : EDITORIAL (1153) EPPO (26 Sep 2023 10:55 AM) 1) To clarify, we refer to scoring probability at the different stages of the PRA 2) More precise wording.
165	Consistency may be assured through, for example, the elaboration of generic decision criteria and procedural steps, training of individuals those conducting PRA, and review of draft PRAs.	P	Category : EDITORIAL (1398) European Union (26 Sep 2023 4:56 PM) Improved drafting.
165	Consistency may be assured through, for example, the elaboration of generic decision criteria and procedural steps, training of individuals conducting PRA, PRA and review of draft PRAs.	P	Category : EDITORIAL (1397) European Union (26 Sep 2023 4:55 PM) Unnecessary comma.
165	Consistency may be assured through, for example, the elaboration of generic decision criteria and procedural steps, training of individuals those conducting PRA, PRA and review of draft PRAs.	P	Category : EDITORIAL (1154) EPPO (26 Sep 2023 10:55 AM) Unnecessary comma. Improved drafting.
165	Consistency may be assured through, for example, the elaboration of generic	C	(182) Imported Comment (30 Jun 2023

	decision criteria and procedural steps, training of individuals conducting PRA, and review of draft PRAs.		3:20 PM) [Originally made by M.Sai on 21 May 2023 5:47 PM] Blue – this paragraph is from section3.5 of ISPM2
168	Where other contracting parties are directly affected by the outcome of an individual PRA, the NPPO conducting the PRA should, on request, supply information about the completion of it, and if possible the anticipated time frame, taking into account avoidance of undue delay (see ISPM 1).	C	Category : TECHNICAL (1399) European Union (26 Sep 2023 4:57 PM) Level of obligation – is 'should' appropriate? See EU general comment to check level of obligation.
168	Where other contracting parties are directly affected by the outcome of an individual PRA, the NPPO conducting the PRA should, on request, supply information about the completion of it, and if possible the anticipated time frame, taking into account avoidance of undue delay (see ISPM 1).	C	Category : SUBSTANTIVE (1155) EPPO (26 Sep 2023 10:55 AM) Level of obligation – is 'should' appropriate? See EPPO general comment to check level of obligation.
168	Where other contracting parties are directly affected by the outcome of an individual PRA, the NPPO conducting the PRA should, on request, supply information about the completion of it, and if possible the anticipated time frame, taking into account avoidance of undue delay (see ISPM 1).	C	(183) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:46 PM] Blue – this paragraph is from section1 of ISPM2
170	3. Scope of PRA	P	Category : SUBSTANTIVE (1719) Mexico (29 Sep 2023 11:37 PM) It is suggested to integrate this text in the background section to avoid confusion with the scope of the standard
170	3. Scope-Extent contents of PRA	P	Category : SUBSTANTIVE (1657) China (28 Sep 2023 3:06 AM) scope usually follow the introduction part in ISPMs. This part is extended contents of PRA.
170	3. Scope of PRA	C	Category : SUBSTANTIVE (1099) APPPC (26 Sep 2023 10:36 AM) Use of the term Coverage instead of Scope and move at the first part of the document Spell out the acronyms (PRA, LMO) for consistency
170	3. Scope of Specific aspects to consider in PRA	P	Category : SUBSTANTIVE (799) COSAVE (12 Sep 2023 7:34 PM) Title changed to better describe the subsections included in the section and to avoid confusion with the scope of the ISPM
170	3. Scope of Specific aspects to consider in PRA	P	Category : SUBSTANTIVE (645) Uruguay (7 Sep 2023 3:56 PM)

			Title changed to better describe the subsections included in the section and to avoid confusion with the scope of the ISPM
171	<p>The range of pests covered by the IPPC extends beyond pests directly affecting cultivated plants. Pests may also include pests indirectly affecting cultivated plants, pests affecting non-cultivated plants, LMOs, and plants as pests.</p>	P	<p><i>Category : SUBSTANTIVE (1718) Mexico (29 Sep 2023 11:37 PM)</i></p> <p>It is suggested to integrate this text in the background section to avoid confusion with the scope of the standard</p>
171	<p><u>The range of pests covered by the IPPC extends beyond pests directly affecting cultivated plants. Pests may also include pests indirectly affecting cultivated plants, pests affecting non-cultivated plants, LMOs, and plants as pests. PRA under the IPPC only relates to the assessment and management of pest risks. The range of pests covered by the IPPC not only includes pests directly affecting cultivated or wild plants, but also pests indirectly affecting cultivated or wild plants, biological control agents, LMOs, and plants as pests. When an NPPO discovers potential for risks that are not phytosanitary, it may be appropriate to notify the relevant authorities. For example, a plant as a pest that has only a minor impact on plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock. However, the regulation of plants solely on the basis of their effects on other organisms or systems (e.g. on human or animal health) is outside the scope of this standard. Therefore, if the PRA process reveals evidence of a potential hazard to other organisms or systems, this should be communicated to the appropriate authorities that have the legal responsibility to deal with the issue.</u></p>	P	<p><i>Category : TECHNICAL (1400) European Union (26 Sep 2023 4:58 PM)</i></p> <p>Improved drafting based on the following reason - I note that in paragraph 171 the phrases "cultivated plants" and "non-cultivated plants" are used. Elsewhere in the draft standard it appears "wild" is used 9 times, and "non-cultivated" only once (here in paragraph 171).</p> <p>Is "wild plant" synonymous with "non-cultivated plant"? Suggest using either only "wild" or "non-cultivated", not both.</p> <p>Suggest replacing "non-cultivated" with "wild" as shown below. Also suggest adding red text as shown (adapted from ISPM 11, 1.4 S2 and ISPM 11 2.3.1 S1).</p>
171	<p><u>The range of pests covered by the IPPC extends beyond pests directly affecting cultivated plants. Pests may also include pests indirectly affecting cultivated plants, pests affecting non-cultivated plants, LMOs, and plants as pests. PRA under the IPPC only relates to the assessment and management of phytosanitary risks. The range of pests covered by the IPPC not only includes pests directly affecting cultivated and /or wild plants but also pests indirectly affecting cultivated and / or wild plants, biological control agents, LMOs, and plants as pests. When an NPPO discovers potential for risks that are not phytosanitary it may be appropriate to notify the relevant authorities. For example, a plant as a pest that has only a minor impact on plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock. However, the regulation of plants solely on the basis of their effects on other organisms or systems (e.g. on human or animal health) is outside the scope of this standard. If the PRA process reveals evidence of a potential hazard to other organisms or systems, this should be communicated to the appropriate authorities that have the legal responsibility to deal with the issue.</u></p>	P	<p><i>Category : TECHNICAL (1156) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Improved drafting based on the following reason - I note that in paragraph 171 the phrases "cultivated plants" and "non-cultivated plants" are used. Elsewhere in the draft standard it appears "wild" is used 9 times, and "non-cultivated" only once (here in paragraph 171).</p> <p>Is "wild plant" synonymous with "non-cultivated plant"? Suggest use either only "wild" or "non-cultivated", not both.</p> <p>Suggest replace "non-cultivated" with "wild" as shown below. Also suggest add red text as shown (adapted from ISPM 11, 1.4 S2 and ISPM 11 2.3.1 S1).</p>

			Biological control agents have also been added (useful addition).
171	The range of pests covered by the IPPC extends beyond pests directly affecting cultivated plants. Pests may also include pests indirectly affecting cultivated plants, pests affecting non-cultivated plants, LMOs, and plants as pests.	C	(184) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:11 PM] Black – this paragraph from ISPM11 is revised.
173	3.1 Environmental risks	C	<i>Category : TECHNICAL</i> (800) COSAVE (12 Sep 2023 7:35 PM) As per general comment we suggest to incorporate under 3.1, the section "Introduction" of Annex 4
173	3.1 Environmental risks	C	<i>Category : TECHNICAL</i> (646) Uruguay (7 Sep 2023 3:59 PM) As per general comment we suggest to incorporate under 3.1, the section "Introduction" of Annex 4
174	The IPPC applies to the protection of wild and cultivated plants. Therefore, pests affecting all types of plants, directly or indirectly, are within the scope of the IPPC. Information on the scope of the IPPC with regard to environmental risks is provided in Annex 4.	C	(185) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:12 PM] Black – this paragraph from ISPM11 is revised.
177	This standard is generally concerned with phenotypic characteristics rather than genotypic characteristics. However, genotypic characteristics may need to be considered when assessing the pest risk posed by an LMO. Information on the scope of the IPPC <u>with regard to</u> <u>regarding</u> PRA for LMOs, together with the factors to consider when determining the potential for an LMO to be a pest, are provided in Annex 5.	P	<i>Category : EDITORIAL</i> (1100) APPPC (26 Sep 2023 10:36 AM)
177	This standard is generally concerned with phenotypic characteristics rather than genotypic characteristics. However, genotypic characteristics may need to be considered when assessing the pest risk posed by an LMO. Information on the scope of the IPPC with regard to PRA for LMOs, together with the factors to consider when determining the potential for an LMO to be a pest, are provided in Annex 5.	C	(186) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:12 PM] Black – this paragraph from ISPM11 is revised.
181	The number and diversity of plants being moved between and within countries is increasing as opportunities for trade increase and markets develop for new plants. Movements of plants may imply two types of pest risk: the plant (as a pathway) may carry pests, or the plant itself may be a pest. The risk of introducing pests with	P	<i>Category : SUBSTANTIVE</i> (1402) European Union (26 Sep 2023 5:02 PM) The risk of plants as pathways for pests are covered in the general PRA, so there is no need to say "has long been recognized...".

	plants as a pathway has long been recognized and widely regulated <ins>is covered in annexes 1-3.</ins> The However, the pest risk posed by plants as pests requires specific consideration. Information on the scope of the IPPC with regard to PRA for plants as pests is provided in Annex 6.		
181	The number and diversity of plants being moved between and within countries is increasing as opportunities for trade increase and markets develop for new plants. Movements of plants may imply two types of pest risk: the plant (as a pathway) may carry pests, or the plant itself may be a pest. The risk of introducing pests with plants as a pathway has long been recognized and widely regulated <ins>is covered in annexes 1-3.</ins> The However, the pest risk posed by plants as pests requires specific consideration. Information on the scope of the IPPC with regard to PRA for plants as pests is provided in Annex 6.	P	<p><i>Category : SUBSTANTIVE</i> (1157) EPPO (26 Sep 2023 10:55 AM) The risk of plants as pathways for pests are covered in the general PRA, no need to say "has long been recognized...".</p>
181	The number and diversity of plants being moved between and within countries is increasing as opportunities for trade increase and markets develop for new plants. Movements of plants may imply two types of pest risk: the plant (as a pathway) may carry pests, or the plant itself may be a pest. The risk of introducing pests with plants as a pathway has long been recognized and widely regulated. However, the pest risk posed by plants as pests requires specific consideration. Information on the scope of the IPPC <u>with regard to</u> <u>regarding</u> PRA for plants as pests is provided in Annex 6.	P	<p><i>Category : EDITORIAL</i> (1101) APPPC (26 Sep 2023 10:36 AM)</p>
181	The number and diversity of plants being moved between and within countries is increasing as opportunities for trade increase and markets develop for new plants. Movements of plants may imply two types of pest risk: the plant (as a pathway) may carry pests, or the plant itself may be a pest. The risk of introducing pests with plants as a pathway has long been recognized and widely regulated. However, the pest risk posed by plants as pests requires specific consideration. Information on the scope of the IPPC with regard to PRA for plants as pests is provided in Annex 6.	C	<p>(187) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:13 PM] Black – this paragraph from ISPM11 is revised.</p>
190	The purpose of the PRA initiation <u>stage</u> is to identify pests and pathways that may potentially be considered quarantine pests or pathways for quarantine pests in relation to the <u>identified-defined</u> PRA area.	P	<p><i>Category : TECHNICAL</i> (1403) European Union (26 Sep 2023 5:03 PM) Improved clarity.</p>
190	The purpose of the PRA initiation <u>stage</u> is to identify pests and pathways that may potentially be considered quarantine pests or pathways for quarantine pests in relation to the <u>identified-defined</u> PRA area.	P	<p><i>Category : TECHNICAL</i> (1158) EPPO (26 Sep 2023 10:55 AM) Improved clarity</p>

190	The purpose of the PRA initiation is to identify pests and pathways that may potentially be considered quarantine pests or pathways for quarantine pests in relation to the identified PRA area.	C	(188) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:17 PM] Black – this paragraph from section1 of ISPM2 is editorially revised.
192	A PRA process may be triggered initiated in the following situations:	P	Category : TECHNICAL (1404) European Union (26 Sep 2023 5:03 PM) Improved clarity.
192	A PRA process may be triggered initiated in the following situations:	P	Category : TECHNICAL (1159) EPPO (26 Sep 2023 10:55 AM) improved clarity
192	A PRA process may be triggered in the following situations:	C	(189) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
194	a request is made to consider a pathway that may present a pest risk and may require phytosanitary measures;	P	Category : TECHNICAL (1405) European Union (26 Sep 2023 5:04 PM) Improved clarity and drafting.
194	a request is made to consider a pathway that may present a pest risk and may require phytosanitary measures;	P	Category : TECHNICAL (1160) EPPO (26 Sep 2023 10:55 AM) Improved clarity and drafting.
196	a decision is made to review or revise phytosanitary measures or policies; or	P	Category : EDITORIAL (1406) European Union (26 Sep 2023 5:05 PM) Brevity.
196	a decision is made to review or revise phytosanitary measures or policies; or	P	Category : EDITORIAL (1161) EPPO (26 Sep 2023 10:55 AM) Brevity
197	a request is made to determine whether an organism is a pest.	P	Category : TECHNICAL (1407) European Union (26 Sep 2023 5:06 PM) Also move up to be the 2nd indent.
197	a request is made to determine whether an organism is a pest.	P	Category : TECHNICAL (1162) EPPO (26 Sep 2023 10:55 AM) Also move up to be the 2nd indent.
198	The initiation stage involves four steps:	C	(190) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
204	When the PRA process has been triggered by a request to consider a pathway, the	C	(191) Imported Comment (30 Jun 2023

	above steps are preceded by assembling a list of organisms of possible regulatory concern because they are likely to be associated with the pathway.		3:20 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
206	At this stage, information is necessary to identify the organism and its potential economic impact <ins>economic, which includes environmental and social impact.</ins> ² Other useful information on the organism may include its geographical distribution, host plants, habitats and association with commodities. For pathways, information about the commodity, including modes of transport, and its intended use, is essential. <ins>For plants and plant products, information about growing conditions, harvesting and processing may be helpful.</ins>	P	Category : TECHNICAL (1408) European Union (26 Sep 2023 5:08 PM) See general comment and earlier comment on economic, social and environmental impact. New text is to improve drafting and aid clarity.
206	At this stage, information is necessary to identify the organism and its potential economic impact <ins>economic, which includes environmental and social impact.</ins> ² Other useful information on the organism may include its geographical distribution, host plants, habitats and association with commodities. For pathways, information about the commodity, including modes of transport, and its intended use, is essential. <ins>For plants and plant products information about growing conditions, harvesting and/or processing may be helpful.”.</ins>	P	Category : TECHNICAL (1163) EPPO (26 Sep 2023 10:55 AM) See general comment and earlier comment on economic, social and environmental impact. New text is to improve drafting and aid clarity.
206	At this stage, information is necessary to identify the organism and its potential economic impact, which includes environmental impact. ² Other useful information on the organism may include its geographical distribution, host plants, habitats and association with commodities. For pathways, information about the commodity, including modes of transport, and its intended use, is essential.	C	(192) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
211	The need for a new or revised PRA for a specific pathway may arise in situations such as when:	C	(193) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:26 PM] Blue – this paragraph is from section1 of ISPM2
213	import is proposed of <ins>for</ins> a commodity not previously imported or a commodity from a new area of origin;	P	Category : EDITORIAL (1409) European Union (26 Sep 2023 5:09 PM) Improved English.
213	import is proposed of <ins>for</ins> a commodity not previously imported or a commodity from a new area of origin;	P	Category : EDITORIAL (1164) EPPO (26 Sep 2023 10:55 AM) Improved English
214	there is an intention to import for selective breeding or scientific research <ins>on</ins> a plant species or cultivar not yet introduced that could potentially be a host of pests;	P	Category : EDITORIAL (1054) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)

214	there is an intention to import for selective breeding or scientific research <u>on</u> a plant species or cultivar not yet introduced that could potentially be a host of pests;	P	<i>Category : EDITORIAL (590) Ghana (30 Aug 2023 11:52 PM)</i>
215	a pathway other than commodity import is identified (<u>natural</u> (for example natural spread, packing material, mail, garbage, compost, passenger baggage, etc.);	P	<i>Category : EDITORIAL (1417) European Union (27 Sep 2023 2:26 PM) Improved drafting.</i>
215	a pathway other than commodity import is identified (<u>natural</u> (for example natural spread, packing material, mail, garbage, compost, passenger baggage, etc.);	P	<i>Category : EDITORIAL (1165) EPPO (26 Sep 2023 10:55 AM) Improved drafting</i>
217	there is a change in the <u>virulence</u> (i.e. the aggressiveness)- <u>virulence/aggressiveness</u> or host range of a pest.	P	<i>Category : EDITORIAL (1418) European Union (27 Sep 2023 2:26 PM) Improved drafting.</i>
217	there is a change in the <u>virulence</u> (i.e. the aggressiveness)- <u>virulence/aggressiveness</u> or host range of a pest.	P	<i>Category : EDITORIAL (1166) EPPO (26 Sep 2023 10:55 AM) Improved English</i>
218	These are situations where the commodity itself is not a pest. When the commodity itself may be a pest, it should also be considered under section 2.4 of this annex.	C	(194) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:26 PM] Blue – this paragraph is from section1 of ISPM2
220	A list of organisms likely to be associated with the pathway should be assembled, including organisms	C	<i>Category : EDITORIAL (1419) European Union (27 Sep 2023 2:28 PM) Increase font size to 11.</i>
220	A list of organisms likely to be associated with the pathway should be assembled, including organisms	C	<i>Category : EDITORIAL (1167) EPPO (26 Sep 2023 10:55 AM) Increase font size to 11.</i>
220	A list of organisms likely to be associated with the pathway should be assembled, including organisms	P	(310) Imported Comment (30 Jun 2023 3:20 PM)
220	A list of organisms likely to be associated with the pathway should be assembled, including organisms	C	(195) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:26 PM] Blue – this paragraph is from section1 of ISPM2
222	that have not yet been clearly identified as pests. When a PRA is carried out for a commodity for which trade already exists, records of <u>actual</u> -pest interceptions should be used as the basis for the listing of associated pests.	P	<i>Category : EDITORIAL (1421) European Union (27 Sep 2023 2:30 PM) Clarity.</i>
222	that have not yet been clearly identified as pests. When a PRA is carried out for a commodity for which trade already exists, records of actual pest interceptions	C	<i>Category : EDITORIAL (1420) European Union (27 Sep 2023 2:28 PM)</i>

	should be used as the basis for the listing of associated pests.		Should not be a separate paragraph. Please merge with previous one.
222	that have not yet been clearly identified as pests. When a PRA is carried out for a commodity for which trade already exists, records of actual pest interceptions should be used as the basis for the listing of associated pests.	C	<i>Category : EDITORIAL</i> (1169) EPPO (26 Sep 2023 10:55 AM) Should not be a separate paragraph. Please merge with previous one.
222	that have not yet been clearly identified as pests. When a PRA is carried out for a commodity for which trade already exists, records <u>of actual</u> <u>of</u> pest interceptions should be used as the basis for the listing of associated pests.	P	<i>Category : EDITORIAL</i> (1168) EPPO (26 Sep 2023 10:55 AM) clarity
224	The need for a new or revised PRA on a specific recognized pest may arise in situations such as when:	C	(196) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:27 PM] Blue – blue colored texts are from ISPM2
226	an infestation or an outbreak of a new pest is discovered within an area (which may be in the exporting country or in another country or countries);	C	<i>Category : SUBSTANTIVE</i> (1661) China (28 Sep 2023 3:18 AM) merged as "an emergency arises on discovery of an established infestation or an outbreak of a new pest within a PRA area".
226	an infestation or an outbreak of a new pest is discovered within an area (which may be in the exporting country or in another country or countries);	C	<i>Category : TECHNICAL</i> (1422) European Union (27 Sep 2023 2:31 PM) Reorganise indents into a more logical order: Preborder 226 237 At border 235 236 Post border 227 232 234 No specific location 229 230 231 238
226	an infestation or an outbreak of a new pest is discovered within an area (which may	C	<i>Category : TECHNICAL</i>

	be in the exporting country or in another country or countries);		(1170) EPPO (26 Sep 2023 10:55 AM) Reorganise indents into a more logical order: Preborder 226 237 At border 235 236 Post border 227 232 234 No specific location 229 230 231 238
226	an infestation or an outbreak of a new pest is discovered within an area (which may be in the exporting country or in another country or countries);	P	<i>Category : TECHNICAL</i> (801) COSAVE (12 Sep 2023 7:38 PM) Deleted text is not from ISPM 2 and does not add additional information, we suggest to keep current wording in ISPM 2
226	an infestation or an outbreak of a new pest is discovered within an area (which may be in the exporting country or in another country or countries) area;	P	<i>Category : TECHNICAL</i> (647) Uruguay (7 Sep 2023 4:02 PM) Deleted text is not from ISPM 2 and does not add additional information, we suggest to keep current wording in ISPM 2
227	an emergency arises on discovery of an established infestation or an outbreak of a new pest within a PRA area (see ISPM 1);	P	<i>Category : TECHNICAL</i> (1423) European Union (27 Sep 2023 2:33 PM) Is this paragraph needed? Is it not covered by the previous one? We suggest deletion. If this paragraph is kept, the previous paragraph could be modified to read: "- an infestation or an outbreak of a new pest is discovered in the exporting country or in another country or countries;" to make the distinction between the two indents.
227	an emergency arises on discovery of an established infestation or an outbreak of a	P	<i>Category : TECHNICAL</i>

	new pest within a PRA area (see ISPM 1);		(1171) EPPO (26 Sep 2023 10:55 AM) Is this paragraph needed? Is it not covered by the previous one? We suggest deletion. If this paragraph is kept, the previous paragraph could be modified to read: "- an infestation or an outbreak of a new pest is discovered in the exporting country or in another country or countries;" to make the distinction between the two indents.
227	an emergency arises on discovery of an established infestation or an outbreak of a new pest within a PRA area (see ISPM 1);	C	(197) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:27 PM] Red – this text is from section 1.1.2 of ISPM11
231	an organism is identified as a vector for other one or more recognized pests;	P	<i>Category : TECHNICAL</i> (1424) European Union (27 Sep 2023 2:33 PM) Accuracy and clarity.
231	an organism is identified as a vector for other one or more recognized pests;	P	<i>Category : TECHNICAL</i> (1172) EPPO (26 Sep 2023 10:55 AM) Accuracy and clarity
232	a pest is introduced into a PRA area;	P	<i>Category : TECHNICAL</i> (1425) European Union (27 Sep 2023 2:34 PM) Is it very different from a change in the status of a pest (next indent)? Merge the two? Also difference from indent 2? We suggest deletion.
232	a pest is introduced into a PRA area;	P	<i>Category : TECHNICAL</i> (1173) EPPO (26 Sep 2023 10:55 AM) Is it very different from a change in the status of a pest (next indent)? Merge the two? Also difference from indent 2? We suggest deletion.
232	a pest is introduced into a PRA area;	C	(198) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Red – this text is from section 1.1.2 of ISPM11
238	an organism is genetically altered in a way which clearly identifies its potential as a pest (LMO).³	C	<i>Category : SUBSTANTIVE</i> (1056) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)

			Delete the word 'LMO' because it confuses the meaning of LMO to be a pest in the context of the sentence
238	an organism is genetically altered in a way which clearly identifies its potential as a pest (LMO)pest. ³	P	Category : SUBSTANTIVE (1055) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)
238	an organism is genetically altered in a way which clearly identifies its potential as a pest (LMO)pest. ³	P	Category : EDITORIAL (591) Ghana (30 Aug 2023 11:53 PM)
238	an organism is genetically altered in a way which clearly identifies its potential as a pest (LMO). ³	C	(199) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Red – this text is from section 1.1.2 of ISPM11
241	In these situations, the fact that the organism is known to be a pest should be recorded in preparation for PRA Stage 2.	C	(200) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Blue – this paragraph is from ISPM2
243	2.3 Review of phytosanitary policies	C	Category : EDITORIAL (913) PPPO (17 Sep 2023 1:13 PM) PPPO proposes for this section (2.3) to be moved after 2.4 so that it makes more sense logically.
244	The need for a new or revised PRA may arise from situations such as when:	C	(201) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Blue – blue colored texts are from section1.1.3 of ISPM2
246	a national review of phytosanitary regulations, requirements or operations is undertaken;	C	Category : TECHNICAL (1426) European Union (27 Sep 2023 2:35 PM) Reorganise indents into a more logical order: 250 246 253 251 249 247
246	a national review of phytosanitary regulations, requirements or operations is undertaken;	C	Category : TECHNICAL (1174) EPPO (26 Sep 2023 10:55 AM) Reorganise indents into a more logical

			order: 250 246 253 251 249 247
247	a proposal made by another country or by an international organization (e.g. a regional plant protection organization, the Food and Agriculture Organization of the United Nations) is reviewed;	C	(202) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Red – this text is from section 1.1.3 of ISPM11
250	a new system, process or procedure is introduced or new information <u>is</u> made available that could influence a previous decision (e.g. results of monitoring; a new treatment or withdrawal of a treatment; new diagnostic methods);	P	Category : EDITORIAL (592) Ghana (30 Aug 2023 11:54 PM)
251	a dispute arises concerning phytosanitary measures; or	C	(203) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Red – this text is from section 1.1.3 of ISPM11
253	the phytosanitary situation in a country changes, a new country is created, or political boundaries are changed.	C	Category : SUBSTANTIVE (600) Guyana (4 Sep 2023 12:05 AM) Review phytosanitary policies when there are established policies however when "Create a new country" - will need to create or establish new policies not review policies
253	the phytosanitary situation in a country changes, a new country is created, or political boundaries are changed.	C	(204) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Red – this text is from section 1.1.3 of ISPM11
255	In these situations, pests will already have been identified and this fact should be recorded in preparation for PRA Stage 2.	C	(205) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Blue – this paragraph is from ISPM2
257	For existing trade, no new phytosanitary measures should be applied until the revision or new PRA has been completed, unless this is warranted by new or unexpected phytosanitary situations that may necessitate emergency measures.	C	Category : SUBSTANTIVE (1427) European Union (27 Sep 2023 2:40 PM) Emergency measures may be required in all the circumstances not only in 2.2 and 2.3. Consequently it can be considered moving this aspect to the end of point 2 (between paragraphs [269] and [271]) and make a

257	For existing trade, no new phytosanitary measures should be applied until the revision or new PRA has been completed, unless this is warranted by new or unexpected phytosanitary situations that may necessitate emergency measures.	C Category : SUBSTANTIVE (1175) EPPO (26 Sep 2023 10:55 AM) Emergency measures may be required in all the circumstances not only in 2.2 and 2.3. Consequently it can be considered moving this aspect to the end of point 2 (between paragraphs [269] and [271]) and make a general statement.
257	For existing trade, no new phytosanitary measures should be applied until the revision or new PRA has been completed, unless this is warranted by new or unexpected phytosanitary situations that may necessitate emergency measures.	C (206) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Blue – this paragraph is from ISPM2
260	An organism may be considered for PRA in situations such as when:	C (207) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Blue – blue texts elements are from ISPM2
264	an emergency arises on interception of a new organism on an imported commodity;	C (208) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:43 PM] Red - this text is from section1.1.2 of ISPM11
269	In these situations, it is necessary to determine if the organism is a pest and thus subject to PRA Stage 2. Section 3 of this annex provides further guidance on this matter.	C (209) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Blue – this paragraph is from ISPM2
272	The initiation points frequently refer to “pests”. The IPPC defines a pest as “any species, strain or biotype of plant, animal or pathogenic agent, injurious to plants or plant products”. When applying considering these initiation points in relation to the specific case of plants as pests, it is important to note that the plants concerned should satisfy this definition. Pests Organisms directly affecting injurious to plants or plant products satisfy this definition. In addition, many organisms indirectly affecting plants or plant products also satisfy this definition (e.g. plants as pests, such as weeds or non-indigenous plants). The fact that they are injurious to plants may be based on evidence of their impact obtained in an area in which they are present. In cases where there is insufficient evidence that they affect plants indirectly, it may nevertheless be appropriate to assess – on the basis of available pertinent information – whether they are potentially injurious in the PRA area by	P Category : TECHNICAL (1428) European Union (27 Sep 2023 2:43 PM) Accuracy and clarity.

	using a clearly documented, consistently applied and transparent system. This is particularly important for plant species or cultivars that are imported for planting.		
272	The initiation points frequently refer to “pests”. The IPPC defines a pest as “any species, strain or biotype of plant, animal or pathogenic agent, injurious to plants or plant products”. When applying considering these initiation points <u>in relation</u> to the specific case of plants as pests, it is important to note that the plants concerned should satisfy this definition. <u>Pests</u> <u>Organisms</u> directly <u>affecting</u> <u>injurious</u> <u>to</u> <u>plants</u> <u>or</u> <u>plant</u> <u>products</u> satisfy this definition. In addition, many organisms indirectly affecting plants <u>or</u> <u>plant</u> <u>products</u> also satisfy this definition (e.g. plants as pests, such as weeds or non-indigenous plants). The fact that they are injurious to plants may be based on evidence of their impact obtained in an area in which they are present. In cases where there is insufficient evidence that they affect plants indirectly, it may nevertheless be appropriate to assess – on the basis of available pertinent information – whether they are potentially injurious in the PRA area by using a clearly documented, consistently applied and transparent system. This is particularly important for plant species or cultivars that are imported for planting.	P	<p>Category : TECHNICAL (1176) EPPO (26 Sep 2023 10:55 AM) Accuracy and clarity</p>
272	The initiation points frequently refer to “pests”. <u>The IPPC defines a pest as “any species, strain or biotype of plant, animal or pathogenic agent, injurious to plants or plant products”</u> . When applying these initiation points to the specific case of plants as pests, it is important to note that the plants concerned should satisfy this definition. Pests directly affecting plants satisfy this definition. In addition, many organisms indirectly affecting plants also satisfy this definition (e.g. plants as pests, such as weeds or non-indigenous plants). The fact that they are injurious to plants may be based on evidence of their impact obtained in an area in which they are present. In cases where there is insufficient evidence that they affect plants indirectly, it may nevertheless be appropriate to assess – on the basis of available pertinent information – whether they are potentially injurious in the PRA area by using a clearly documented, consistently applied and transparent system. This is particularly important for plant species or cultivars that are imported for planting.	P	<p>Category : EDITORIAL (914) PPPO (17 Sep 2023 1:13 PM) To define 'pest' is repetitive (already defined in ISPM No. 5).</p>
272	The initiation points frequently refer to “pests”. The IPPC defines a pest as “any species, strain or biotype of plant, animal or pathogenic agent, injurious to plants or plant products”. When applying these initiation points to the specific case of plants as pests, it is important to note that the plants concerned should satisfy this definition. Pests directly affecting plants satisfy this definition. In addition, many	C	<p>(210) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Red – this paragraph is from S1 of section1.1 of ISPM11</p>

	organisms indirectly affecting plants also satisfy this definition (e.g. plants as pests, such as weeds or non-indigenous plants). The fact that they are injurious to plants may be based on evidence of their impact obtained in an area in which they are present. In cases where there is insufficient evidence that they affect plants indirectly, it may nevertheless be appropriate to assess – on the basis of available pertinent information – whether they are potentially injurious in the PRA area by using a clearly documented, consistently applied and transparent system. This is particularly important for plant species or cultivars that are imported for planting.		
274	“Preselection” or “screening” are terms sometimes used to cover the early step of determining whether an organism is a pest or not.	C	(211) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Blue – this paragraph is from ISPM 2
276	The taxonomic identity of the organism should be defined because any biological and other information used should be relevant to the organism in question. If the organism has not yet been fully named or described, then, to be determined as a pest, it should at least have been shown to be identifiable, consistently to produce injury to plants or plant products (e.g. symptoms, reduced growth rate, yield loss or any other damage) and to be transmissible or able to disperse spread.	P	Category : EDITORIAL (1429) European Union (27 Sep 2023 2:45 PM) Better verb.
276	The taxonomic identity of the organism should be defined because any biological and other information used should be relevant to the organism in question. If the organism has not yet been fully named or described, then, to be determined as a pest, it should at least have been shown to be identifiable, consistently to produce injury to plants or plant products (e.g. symptoms, reduced growth rate, yield loss or any other damage) and to be transmissible or able to disperse spread.	P	Category : EDITORIAL (1177) EPPO (26 Sep 2023 10:55 AM) Better verb
276	The taxonomic identity of the organism should be defined because any biological and other information used should be relevant to the organism in question. If the organism has not yet been fully named or described, then, to be determined as a pest, it should at least have been shown to be identifiable, consistently to produce causes injury to plants or plant products (e.g. symptoms, reduced growth rate, yield loss or any other damage) and to be transmissible or able to disperse.	P	Category : EDITORIAL (593) Ghana (30 Aug 2023 11:56 PM)
276	The taxonomic identity of the organism should be defined because any biological and other information used should be relevant to the organism in question. If the organism has not yet been fully named or described, then, to be determined as a pest, it should at least have been shown to be identifiable, consistently to produce injury to plants or plant products (e.g. symptoms, reduced growth rate, yield loss or	C	(212) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2

	any other damage) and to be transmissible or able to disperse.		
278	The taxonomic level for organisms considered in PRA is generally the species. The use of a higher or lower taxonomic level should be supported by a scientifically sound rationale. In cases where the level used is below the species, this rationale should include evidence of reported significant variation in factors such as virulence, pesticide resistance, environmental adaptability, host range or its role as a vector.	C	(213) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2
280	Predictive indicators of an organism are characteristics that, if found, would suggest the organism may be a pest. The information on the organism should be checked against such indicators, and if none are found, it may be concluded that the organism is not a pest, and the analysis may be ended by recording the basis of that decision.	C	(214) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2
282	The following are examples of indicators that may be considered:	C	Category : SUBSTANTIVE (613) Madagascar (5 Sep 2023 10:40 AM) Biology cycle have to be considered
282	The following are examples of indicators that may be considered:	C	(215) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2
291	Particular cases for analysis include plant species, biological control agents and other beneficial organisms (see ISPM 3 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>)), organisms which have not yet been fully named or described, or are difficult to identify, intentionally imported organisms and LMOs. The potential of plants as pests should be determined as outlined in Annex 6. The potential of LMOs as pests should be determined as outlined in Annex 5.	C	Category : TECHNICAL (1431) European Union (27 Sep 2023 2:48 PM) Why Annex 6 before Annex 5? Reverse order?
291	Particular cases for analysis include plant species, biological control agents and other beneficial organisms (see ISPM 3 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>)), organisms which have not yet been fully named or described, or are difficult to identify, intentionally imported organisms and LMOs. The potential of plants as pests should be determined as outlined in Annex 6. The potential of LMOs as pests should be determined as outlined in Annex 5.	C	Category : TECHNICAL (1430) European Union (27 Sep 2023 2:47 PM) Question: Would it be better to have LMOs in annex 5 first, then plants as pests in annex 6 (more logical order).
291	Particular cases for analysis include plant species, biological control agents and	C	Category : TECHNICAL (1179) EPPO (26 Sep 2023 10:55 AM)

	other beneficial organisms (see ISPM 3 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>)), organisms which have not yet been fully named or described, or are difficult to identify, intentionally imported organisms and LMOs. The potential of plants as pests should be determined as outlined in Annex 6. The potential of LMOs as pests should be determined as outlined in Annex 5.		Question: Would it be better to have LMOs in annex 5 first, then plants as pests in annex 6 (more logical order).
291	Particular cases for analysis include plant species, biological control agents and other beneficial organisms (see ISPM 3 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>)), organisms which have not yet been fully named or described, or are difficult to identify, intentionally imported organisms and LMOs. The potential of plants as pests should be determined as outlined in Annex 6. The potential of LMOs as pests should be determined as outlined in Annex 5.	C	Category : TECHNICAL (1178) EPPO (26 Sep 2023 10:55 AM) Why Annex 6 before Annex 5? Reverse order?
291	Particular cases for analysis include plant species, biological control agents and other beneficial organisms (see ISPM 3 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>)), organisms which have not yet been fully named or described, or are difficult to identify, intentionally imported organisms and LMOs. The potential of plants as pests should be determined as outlined in Annex 6. The potential of LMOs as pests should be determined as outlined in Annex 5.	C	(216) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:23 PM] Blue – this paragraph is from ISPM 2
294	<u>When performing a PRA, the main concern is to look for potential injury to non-target organisms. Biological control agents and other beneficial organisms are intended to be beneficial to plants. Thus, when performing a PRA, the main concern is to look for potential injury to non-target organisms.⁴ Other concerns may include</u> the:	P	Category : TECHNICAL (1432) European Union (27 Sep 2023 2:49 PM) Needed to be rephrased, as biological control agents will be injurious to plants, if the aim is to control a weed.
294	<u>When performing a PRA, the main concern is to look for potential injury to non-target organisms. Biological control agents and other beneficial organisms are intended to be beneficial to plants. Thus, when performing a PRA, the main concern is to look for potential injury to non-target organisms.⁴ Other concerns may include</u> the:	P	Category : TECHNICAL (1180) EPPO (26 Sep 2023 10:55 AM) It needs to be rephrased, as biological control agents will be injurious to plants, if the aim is to control a weed.
294	Biological control agents and other beneficial organisms are intended to be beneficial to plants. Thus, when performing a PRA, the main concern is to look for potential injury to non-target organisms. ⁴ Other concerns may include:	C	(217) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:45 PM] Blue – this paragraph is from ISPM 2

298	<p>reliability of containment facilities when such are required. <u>-effective in controlling the target pest feasibly</u></p>	P	<p>Category : TECHNICAL (615) Tanzania (5 Sep 2023 10:45 AM)</p>
300	<p>Organisms that have not yet been fully named or described or are difficult to identify (e.g. damaged specimen, unidentifiable life stages) may be detected in imported consignments or during surveillance, in <u>which such a</u> case a decision as to whether phytosanitary action is justified and recommendations for phytosanitary measures may need to be made. These should be based on a PRA using the information available, even if very limited. It is recommended that, in such cases, specimens are deposited in an accessible reference collection for future further examination.</p>	P	<p>Category : EDITORIAL (1433) European Union (27 Sep 2023 2:51 PM) Clarity.</p>
300	<p>Organisms that have not yet been fully named or described or are difficult to identify (e.g. damaged specimen, unidentifiable life stages) may be detected in imported consignments or during surveillance, in <u>which such a</u> case a decision as to whether phytosanitary action is justified and recommendations for phytosanitary measures may need to be made. These should be based on a PRA using the information available, even if very limited. It is recommended that, in such cases, specimens are deposited in an accessible reference collection for future further examination.</p>	P	<p>Category : EDITORIAL (1181) EPPO (26 Sep 2023 10:55 AM) clarity</p>
300	<p>Organisms that have not yet been fully named or described or are difficult to identify (e.g. damaged specimen, unidentifiable life stages) may be detected in imported consignments or during surveillance, in which case a decision as to whether phytosanitary action is justified and recommendations for phytosanitary measures may need to be made. These should be based on a PRA using the information available, even if very limited. It is recommended that, in such cases, specimens are deposited in an accessible reference collection for future further examination.</p>	P	<p>Category : EDITORIAL (594) Ghana (30 Aug 2023 11:57 PM)</p>
300	<p>Organisms that have not yet been fully named or described or are difficult to identify (e.g. damaged specimen, unidentifiable life stages) may be detected in imported consignments or during surveillance, in which case a decision as to whether phytosanitary action is justified and recommendations for phytosanitary measures may need to be made. These should be based on a PRA using the information available, even if very limited. It is recommended that, in such cases, specimens are deposited in an accessible reference collection for future further examination.</p>	C	<p>(218) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:45 PM] Blue – this paragraph is from ISPM 2</p>

303	When a request is made to import an organism that may be a pest for use in scientific research, education, industry or other purposes, the identity of the organism should be clearly defined. Information on the organism or closely related organisms may be assessed to identify indicators that it may be a pest. For organisms determined to be pests, pest risk assessment may be carried out.	C	Category : TECHNICAL (1435) European Union (27 Sep 2023 2:52 PM) The final sentence is either not clear or doesn't make sense. Is it in the wrong place? Can it be deleted? Does this refer to a pest imported for scientific research?
303	When a request is made to import an organism that may be a pest for use in scientific research, education, industry or other purposes, the identity of the organism should be clearly defined. Information on the organism or closely related organisms may be assessed to identify indicators that it may be a pest. For organisms determined to be pests, pest risk assessment may be carried out.	C	Category : TECHNICAL (1434) European Union (27 Sep 2023 2:52 PM) The final sentence is either not clear or doesn't make sense. Is it in the wrong place? Can it be deleted? Does this refer to a pest imported for scientific research?
303	When a request is made to import an organism that may be a pest for use in scientific research, education, industry or other purposes, the identity of the organism should be clearly defined. Information on the organism or closely related organisms may be assessed to identify indicators that it may be a pest. For organisms determined to be pests, pest risk assessment may be carried out.	C	Category : TECHNICAL (1182) EPPO (26 Sep 2023 10:55 AM) The final sentence is either not clear or doesn't make sense. Is it in the wrong place? Can it be deleted? Does this refer to a pest imported for scientific research?
303	When a request is made to import an organism that may be a pest for use in scientific research, education, industry or other purposes, the identity of the organism should be clearly defined. Information on the organism or closely related organisms may be assessed to identify indicators that it may be a pest. For organisms determined to be pests, pest risk assessment may be carried out.	C	(219) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:23 PM] Blue – this paragraph is from ISPM 2
306	The area to which the PRA refers should be clearly defined. It may be the whole or part of a country or several countries. Whereas information may be gathered from a wider geographical area, the analysis of establishment, spread and economic impact should relate only to the defined PRA area.	C	(220) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:23 PM] Blue – this paragraph is from ISPM 2
308	In PRA Stage 2, the endangered area is identified. In PRA Stage 3, the regulated area may, however, be designated as wider than the endangered area if technically justified and not in conflict with the principle of non-discrimination.	C	Category : SUBSTANTIVE (1436) European Union (27 Sep 2023 2:53 PM) This Annex is about initiation so should not be covered here.
308	In PRA Stage 2, the endangered area is identified. In PRA Stage 3, the regulated area may, however, be designated as wider than the endangered area if technically justified and not in conflict with the principle of non-discrimination.	C	Category : SUBSTANTIVE (1183) EPPO (26 Sep 2023 10:55 AM) This Annex is about initiation so should not be covered here.
308	In PRA Stage 2, the endangered area is identified. In PRA Stage 3, the regulated area may, however, be designated as wider than the endangered area if technically	C	(221) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023

	justified and not in conflict with the principle of non-discrimination.		5:23 PM] Blue – this paragraph is from ISPM 2
310	5. Information	P	<p><i>Category : TECHNICAL (1437) European Union (27 Sep 2023 2:54 PM)</i></p> <p>Is this section necessary given it is generic and is already included in the main body of the standard (section 2.1)? If it has to remain in this annex, it would be better combining with paragraph 206 of the introduction.</p>
310	5. Information	P	<p><i>Category : TECHNICAL (1184) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Is this section necessary given it is generic and is already included in the main body of the standard. If it has to remain in this annex, it would be better combining with paragraph 206 of the introduction.</p>
310	5. Information	P	<p><i>Category : TECHNICAL (802) COSAVE (12 Sep 2023 7:39 PM)</i></p> <p>We suggest to delete section 5 to avoid repetition with section 1 if Annex 1 and section 2.1 of core text</p>
310	5. Information	C	<p><i>Category : TECHNICAL (650) Uruguay (7 Sep 2023 4:12 PM)</i></p> <p>We suggest to delete section 5 to avoid repetition with section 1 if Annex 1 and section 2.1 of core text</p>
311	Information gathering is an essential element of all stages of PRA. It should be carried out at the initiation stage in order to clarify the identity of the pest (or pests), its present distribution and association with host plants or commodities, and so on. Other information should be gathered as required to reach necessary decisions as the PRA continues.	C	<p><i>Category : EDITORIAL (1438) European Union (27 Sep 2023 2:55 PM)</i></p> <p>..... not really standard type of wording.</p> <p>we wonder if this is redundant as most of the text is already in the general part 2.1 ([100]-[103])</p> <p>Is this section necessary given it is generic and is already included in the main body of the standard?</p> <p>If it has to remain in this annex, it would be better combining with paragraph 206 of the introduction.</p>
311	Information gathering is an essential element of all stages of PRA. It should be	C	<i>Category : EDITORIAL</i>

	<p>carried out at the initiation stage in order to clarify the identity of the pest (or pests), its present distribution and association with host plants or commodities, and so on. Other information should be gathered as required to reach necessary decisions as the PRA continues.</p>		<p>(1185) EPPO (26 Sep 2023 10:55 AM) We wonder if this is redundant as most of the text is already in the general part 2.1 ([100]-[103])</p> <p>Is this section necessary given it is generic and is already included in the main body of the standard?</p> <p>If it has to remain in this annex, it would be better combining with paragraph 206 of the introduction.</p> <p>'and so on' is not really standard type of wording.</p>
311	<p>Information gathering is an essential element of all stages of PRA. It should be carried out at the initiation stage in order to clarify the identity of the pest (or pests), its present distribution and association with host plants or commodities, and so on. Other information should be gathered as required to reach necessary decisions as the PRA continues.</p>	P	<p><i>Category : TECHNICAL</i></p> <p>(803) COSAVE (12 Sep 2023 7:39 PM) Deleted to avoid repetition with last paragraph of section 1 of this Annex</p>
311	<p>Information gathering is an essential element of all stages of PRA. It should be carried out at the initiation stage in order to clarify the identity of the pest (or pests), its present distribution and association with host plants or commodities, and so on. Other information should be gathered as required to reach necessary decisions as the PRA continues.</p>	P	<p><i>Category : TECHNICAL</i></p> <p>(652) Uruguay (7 Sep 2023 4:14 PM) Deleted to avoid repetition with last paragraph of section 1 of this Annex</p>
311	<p>Information gathering is an essential element of all stages of PRA. It should be carried out at the initiation stage in order to clarify the identity of the pest (or pests), its present distribution and association with host plants or commodities, and so on. Other information should be gathered as required to reach necessary decisions as the PRA continues.</p>	C	<p>(222) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:30 PM] Red – the paragraph is from section1.3 of ISPM11</p>
313	<p>Information for PRA may come from a variety of sources. The provision of official information necessary for PRA, to the extent that is possible, is an obligation on contracting parties under the IPPC (Article VIII.1(c)), facilitated by official contact points (Article VIII.2).</p>	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(1439) European Union (27 Sep 2023 2:57 PM) Same repetition from section 2.1 of the main body of the standard.</p> <p>Is this section necessary given it is generic and is already included in the main body of the standard. If it has to remain in this annex, it would be better combining with</p>

			paragraph 206 of the introduction.
313	Information for PRA may come from a variety of sources. The provision of official information necessary for PRA, to the extent that is possible, is an obligation on contracting parties under the IPPC (Article VIII.1(c)), facilitated by official contact points (Article VIII.2).	C	<p>Category : EDITORIAL (1186) EPPO (26 Sep 2023 10:55 AM) Same repetition from section 2.1 of the main body of the standard.</p> <p>Is this section necessary given it is generic and is already included in the main body of the standard. If it has to remain in this annex, it would be better combining with paragraph 206 of the introduction.</p>
313	Information for PRA may come from a variety of sources. The provision of official information necessary for PRA, to the extent that is possible, is an obligation on contracting parties under the IPPC (Article VIII.1(c)), facilitated by official contact points (Article VIII.2).	P	<p>Category : TECHNICAL (804) COSAVE (12 Sep 2023 7:40 PM) This paragraph is general and it is included in section 2.1 "Information gathering" in the core text</p>
313	Information for PRA may come from a variety of sources. The provision of official information necessary for PRA, to the extent that is possible, is an obligation on contracting parties under the IPPC (Article VIII.1(c)), facilitated by official contact points (Article VIII.2).	P	<p>Category : TECHNICAL (654) Uruguay (7 Sep 2023 4:17 PM) This paragraph is general and it is included in section 2.1 "Information gathering" in the core text</p>
313	Information for PRA may come from a variety of sources. The provision of official information necessary for PRA, to the extent that is possible, is an obligation on contracting parties under the IPPC (Article VIII.1(c)), facilitated by official contact points (Article VIII.2).	C	<p>(223) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:31 PM] Red – the paragraph is from section 1.3 of ISPM11</p>
315	6. Previous pest risk analyses	C	<p>Category : SUBSTANTIVE (1440) European Union (27 Sep 2023 2:57 PM) This point should be placed just before section 3.</p>
315	6. Previous pest risk analyses	C	<p>Category : SUBSTANTIVE (1187) EPPO (26 Sep 2023 10:55 AM) This point should be placed just before section 3.</p>
316	Before performing a new PRA, a check should be made to determine if the organism, pest or pathway has ever been subjected to a previous PRA. The validity of any existing analysis should be verified because circumstances and information may have changed. Its relevance to the PRA area should be confirmed.	P	<p>Category : EDITORIAL (1441) European Union (27 Sep 2023 2:58 PM) Not necessary to refer to "previous", this is redundant.</p>
316	Before performing a new PRA, a check should be made to determine if the organism, pest or pathway has ever been subjected to a previous PRA. The validity of any existing analysis should be verified because circumstances and information	C	<p>Category : EDITORIAL (1188) EPPO (26 Sep 2023 10:55 AM) Not necessary to refer to "previous", this is redundant.</p>

	may have changed. Its relevance to the PRA area should be confirmed.		
316	Before performing a new PRA, a check should be made to determine if the organism, pest or pathway has ever been subjected to a previous PRA. The validity of any existing analysis should be verified because circumstances and information may have changed. Its relevance to the PRA area should be confirmed.	C	(224) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:07 PM] Blue – this paragraph is from ISPM2
318	The possibility of using <u>information from</u> a PRA of a similar organism, pest or pathway (<u>e.g. congener</u>) may also be investigated, particularly when information on the specific organism is absent or incomplete. <u>The use of such information increases uncertainty.</u> Information assembled for other purposes, such as environmental impact assessments of the same or a closely related organism, may be useful but cannot substitute for a PRA.	P	Category : TECHNICAL (1078) Canada (25 Sep 2023 4:22 PM) Using the PRA of a similar organism or pest should not be presented as an option. Although species in the same genera can serve as a basis for an assessment, their PRA should not be used as the only proxy for a poorly characterized species.
318	The possibility of using a PRA of a similar organism, pest or pathway may also be investigated, particularly when information on the specific organism is absent or incomplete. Information assembled for other purposes, such as environmental impact assessments of the same or a closely related organism, may be useful but cannot substitute for a PRA.	C	(225) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:07 PM] Blue – this paragraph is from ISPM2
321	At the end of PRA Stage 1, pests and pathways of concern will have been identified and the PRA area defined. Relevant information will have been collected and pests identified as candidates for further assessment, either individually or in association with a pathway.	C	(226) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:04 PM] Blue – this paragraph is from ISPM2
323	<u>Organisms determined not to be pests and pathways not carrying pests need not be further assessed. The decision and rationale should be recorded and communicated, as appropriate.</u> Organisms determined not to be pests need not be further assessed. Potential pathways determined not to provide a means for pest entry or spread need not be further assessed. The decision and rationale should be recorded and communicated, as appropriate.	P	Category : TECHNICAL (1442) European Union (27 Sep 2023 2:59 PM) Improved accuracy and clarity.
323	<u>Organisms determined not to be pests and pathways not carrying pests need not be further assessed. The decision and rationale should be recorded and communicated, as appropriate.</u> Organisms determined not to be pests need not be further assessed. Potential pathways determined not to provide a means for pest entry or spread need not be further assessed. The decision and rationale should be recorded and communicated, as appropriate.	P	Category : TECHNICAL (1189) EPPO (26 Sep 2023 10:55 AM) Improved accuracy and clarity
323	Organisms determined not to be pests and pathways not carrying pests need not be further assessed. The decision and rationale should be recorded and communicated, as appropriate.	C	(227) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:05 PM] Blue – this paragraph is from ISPM2

325	Where an organism has been determined to be a pest, the process may continue to PRA Stage 2. Where a list of pests has been identified for a pathway, pests may be assessed as groups, if biologically similar, or separately.	C	(228) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:05 PM] Blue – this paragraph is from ISPM2
327	Where the PRA is specifically aimed at determining if the pest should be regulated as a quarantine pest, the process may proceed immediately to the pest categorization step of pest risk assessment (PRA Stage 2), described in Annex 2 of this standard.	C	<i>Category : TECHNICAL</i> (1443) European Union (27 Sep 2023 3:00 PM) This sentence would be more appropriately placed after para [190] at the beginning of section 1. Due to the fact that it suggests that in this specific case you can skip the whole Stage 1 and go directly to Stage 2.
327	Where the PRA is specifically aimed at determining if the pest should be regulated as a quarantine pest, the process may proceed immediately to the pest categorization step of pest risk assessment (PRA Stage 2), described in Annex 2 of this standard.	C	<i>Category : TECHNICAL</i> (1190) EPPO (26 Sep 2023 10:55 AM) This sentence would be more appropriately placed after para [190] at the beginning of section 1. Due to the fact that it suggests that in this specific case you can skip the whole Stage 1 and go directly to Stage 2.
327	Where the PRA is specifically aimed at determining if the pest should be regulated as a quarantine pest, the process may proceed immediately to the pest categorization step of pest risk assessment (PRA Stage 2), described in Annex 2 of this standard.	C	(229) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:05 PM] Blue – this paragraph is from ISPM2
337	ANNEX 2: Pest risk assessment (PRA Stage 2)	C	<i>Category : TECHNICAL</i> (1042) Canada (22 Sep 2023 10:27 PM) In addition to including a reference to the FG CCPI report, reference to climate change may be made in Annex 2 where appropriate. There are already several references to climate change in Annex 6, which contain special considerations for pest risk analysis for plants as quarantine pests, that would also be appropriate to include in equivalent section of Annex 2, which contains guidance on pest risk assessment that is applicable to all pests, but is more tailored to pests such as insects and pathogens . Climate change has the potential to affect all pests, not only plants as pests; as such, it is important to capture climate change consideration in Annex 2 as well. Reference to climate change in Annex 2 would assist in reinforcing the importance of climate

			change considerations in PRA (beyond the mention of the FC CCPI technical resource) and would also promote consistency between the guidance for plants as pest (Annex 6) and other pests (Annex 2)
339	The process for pest risk assessment can be broadly divided into three interrelated steps:	C	(230) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:50 PM] Red – this paragraph is from section2 of ISPM11
343	assessment of potential consequences <ins>economic consequences</ins> .(including environmental consequences)	P	Category : SUBSTANTIVE (805) COSAVE (12 Sep 2023 7:42 PM) As per general comment
343	assessment of potential economic consequences <ins>economic consequences</ins> .(including environmental consequences)	P	Category : SUBSTANTIVE (656) Uruguay (7 Sep 2023 4:19 PM) As per general comment
344	In most cases, these steps will be applied sequentially in a PRA, but it is not essential to follow a particular sequence. Pest risk assessment needs to be only as complex as is technically justified by the circumstances.	C	Category : SUBSTANTIVE (619) United States of America (7 Sep 2023 2:02 PM) The revision of the section 2 is necessary to avoid the redundancy of the processes outlined in different subsections. When considering the definition of quarantine pest, take into account that some invasive pests were not recorded as pests of potential economic importance, but brought devastating impact after being introduced into new areas.
344	In most cases, these steps will be applied sequentially in a PRA, but it is not essential to follow a particular sequence. Pest risk assessment needs to be only as complex as is technically justified by the circumstances.	C	(231) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:51 PM] Red – this paragraph is from section2 of ISPM11
347	At the outset, it may not be clear which pest or pests identified in Stage 1 require a PRA. The categorization process examines, for each pest, whether the criteria in the definition of a quarantine pest are satisfied, namely that the pest:	C	(232) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:08 PM] Red - this paragraph is from section2.1 of ISPM11
349	is not present in the PRA area or, if present, is of limited distribution and subject to official control or being considered for official control;	C	(233) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:09 PM] Blue – three indents are from section1.5 of ISPM2
351	has the potential to cause injury to plants or plant products in the PRA area; and	P	Category : TECHNICAL (1049) Canada (22 Sep 2023 11:04 PM)

352	<p>has the potential to establish and spread in the PRA area.</p> <p><u>-- has the potential to cause injury to plants or plant products in the PRA area; and</u></p>	P <p>Category : TECHNICAL (1050) Canada (22 Sep 2023 11:07 PM) Reverse order of second and third bullets in order for the bullet on establishment and spread comes before bullet on injury (i.e. consequence). This change would be in keeping with the order of risk elements in other parts of the document (e.g. see last two bullets of 2.1, "Elements of categorization")</p>
353	<p>In the evaluation of a pathway associated with a commodity, multiple individual PRAs may be necessary for the various pests potentially associated with the pathway. The opportunity to eliminate an organism-a pest or organisms-pests from consideration before in-depth examination is undertaken is a valuable characteristic of the categorization process.</p>	P <p>Category : TECHNICAL (1444) European Union (27 Sep 2023 3:02 PM) Accuracy and clarity.</p>
353	<p>In the evaluation of a pathway associated with a commodity, multiple individual PRAs may be necessary for the various pests potentially associated with the pathway. The opportunity to eliminate an organism-a pest or organisms-pests from consideration before in-depth examination is undertaken is a valuable characteristic of the categorization process.</p>	P <p>Category : TECHNICAL (1191) EPPO (26 Sep 2023 10:55 AM) Accuracy and clarity</p>
353	<p>In the evaluation of a pathway associated with a commodity, multiple individual PRAs may be necessary for the various pests potentially associated with the pathway. The opportunity to eliminate an organism or organisms from consideration before in-depth examination is undertaken is a valuable characteristic of the categorization process.</p>	C <p>(234) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:09 PM] Red - this paragraph is from section2.1 of ISPM11</p>
355	<p>An advantage of pest categorization is that it can be done with relatively little information; however, information should be sufficient to adequately carry out the categorization.</p>	C <p>(235) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:09 PM] Red - this paragraph is from section2.1 of ISPM11</p>
358	<p>The criteria for categorization of a pest as a quarantine pest consist of the following primary elements:</p>	C <p>(236) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:56 PM] Red - this paragraph is from section2.1.1 of ISPM11</p>
364	<p>potential for <u>economic</u> consequences in the PRA area.</p>	P <p>Category : SUBSTANTIVE (806) COSAVE (12 Sep 2023 7:50 PM) As per general comment</p>
364	<p>potential for <u>economic</u> consequences in the PRA area.</p>	P <p>Category : SUBSTANTIVE</p>

		(657) Uruguay (7 Sep 2023 4:20 PM) As per general comment
365	2.1.1 Identity of the pest	P <i>Category : EDITORIAL</i> (1445) European Union (27 Sep 2023 3:04 PM) Better English.
365	2.1.1 Identity of the pest	P <i>Category : EDITORIAL</i> (1192) EPPO (26 Sep 2023 10:55 AM) better English
366	The identity of the pest should be clearly defined to ensure that the assessment is being performed on a distinct organism, and that biological and other information used in the assessment is relevant to the organism in question. If this is not possible because the causal agent of particular symptoms has not yet been fully identified, then the organism should have been shown to produce consistent symptoms and to be transmissible or able to disperse.	C <i>Category : SUBSTANTIVE</i> (1662) China (28 Sep 2023 3:19 AM) This paragraph introduces the selection requirements for the in-plant unit, and should also introduce a selection requirement for the above-plant unit. The genus is generally larger, and the application of the genus in risk analysis has a wider range of influence.
366	The identity of the pest should be clearly defined to ensure that the assessment is being performed on a distinct organism, and that biological and other information used in the assessment is relevant to the organism in question. If this is not possible because the causal agent of particular symptoms has not yet been fully identified, then the organism should have been shown to produce consistent symptoms and to be transmissible or able to disperse.	P <i>Category : EDITORIAL</i> (1447) European Union (27 Sep 2023 3:05 PM) See above: better to use "spread"?
366	The identity of the pest should be clearly defined to ensure that the assessment is being performed on a distinct organism, and that biological and other information used in the assessment is relevant to the organism in question. If this is not possible because the causal agent of particular symptoms has not yet been fully identified, then the organism should have been shown to produce consistent symptoms and to be transmissible or able to disperse.	C <i>Category : SUBSTANTIVE</i> (1446) European Union (27 Sep 2023 3:04 PM) Question: In paragraph 276, the following is used – “identifiable, consistently to produce injury to plants or plant products (e.g. symptoms, reduced growth rate, yield loss or any other damage) and to be transmissible or able to disperse”. Should similar wording be used here too. “Consistent symptoms” may not be equivalent to “consistently produce injury to plants or plant products”.
366	The identity of the pest should be clearly defined to ensure that the assessment is being performed on a distinct organism, and that biological and other information used in the assessment is relevant to the organism in question. If this is not possible because the causal agent of particular symptoms has not yet been fully identified, then the organism should have been shown to produce consistent symptoms and to	C <i>Category : SUBSTANTIVE</i> (1194) EPPO (26 Sep 2023 10:55 AM) Question: In paragraph 276, the following is used – “identifiable, consistently to produce injury to plants or plant products (e.g. symptoms, reduced growth rate, yield loss

	be transmissible or able to disperse.		or any other damage) and to be transmissible or able to disperse". Should similar wording be used here too. "Consistent symptoms" may not be equivalent to "consistently produce injury to plants or plant products".
366	The identity of the pest should be clearly defined to ensure that the assessment is being performed on a distinct organism, and that biological and other information used in the assessment is relevant to the organism in question. If this is not possible because the causal agent of particular symptoms has not yet been fully identified, then the organism should have been shown to produce consistent symptoms and to be transmissible or able to disperse.	C	Category : EDITORIAL (1193) EPPO (26 Sep 2023 10:55 AM) See above: better to use "spread"?
366	The identity of the pest should be clearly defined to ensure that the assessment is being performed on a distinct organism, and that biological and other information used in the assessment is relevant to the organism in question. If this is not possible because the causal agent of particular symptoms has not yet been fully identified, then the organism should have been shown to produce consistent symptoms and to be transmissible or able to disperse.	P	Category : EDITORIAL (595) Ghana (30 Aug 2023 11:58 PM)
366	The identity of the pest should be clearly defined to ensure that the assessment is being performed on a distinct organism, and that biological and other information used in the assessment is relevant to the organism in question. If this is not possible because the causal agent of particular symptoms has not yet been fully identified, then the organism should have been shown to produce consistent symptoms and to be transmissible or able to disperse.	C	(237) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:12 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
368	The taxonomic unit for the pest is generally the species. The use of a higher or lower taxonomic level should be supported by a scientifically sound rationale. In cases where the level used is below the species, this rationale should include evidence demonstrating that factors such as differences in virulence, pesticide resistance, environmental adaptability, host range or vector relationships are significant enough to affect pest risk.	P	Category : SUBSTANTIVE (1448) European Union (27 Sep 2023 3:06 PM) This is duplication of paragraph 278 in the main body of the standard. Suggest delete 368; consider reference to 278.
368	The taxonomic unit for the pest is generally the species. The use of a higher or lower taxonomic level should be supported by a scientifically sound rationale. In cases where the level used is below the species, this rationale should include evidence demonstrating that factors such as differences in virulence, pesticide resistance, environmental adaptability, host range or vector relationships are significant enough to affect pest risk.	P	Category : SUBSTANTIVE (1195) EPPO (26 Sep 2023 10:55 AM) This is duplication of paragraph 278 in the main body of the standard. Suggest delete 368; consider reference to 278.

368	The taxonomic unit for the pest is generally the species. The use of a higher or lower taxonomic level should be supported by a scientifically sound rationale. In cases where the level used is below the species, this rationale should include evidence demonstrating that factors such as differences in virulence, pesticide resistance, environmental adaptability, host range or vector relationships are significant enough to affect pest risk.	C	(238) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:58 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
370	In cases where a vector is involved, the vector may also be considered a pest to the extent that it is associated with the causal organism and is required for transmission of the pest.	C	(239) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 10:59 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
372	Specific guidance on the consideration of LMOs and the identity of plants as pests is provided in Annexes 5 and 6.	C	(240) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:23 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
374	2.1.2 Presence or absence in the PRA area	P	Category : EDITORIAL (1449) European Union (27 Sep 2023 3:08 PM) Better wording.
374	2.1.2 Presence or absence in the PRA area	P	Category : EDITORIAL (1196) EPPO (26 Sep 2023 10:55 AM) Better wording.
375	The pest should be absent from all or a defined part of the PRA area.	C	Category : SUBSTANTIVE (1450) European Union (27 Sep 2023 3:09 PM) In paragraph 377 there is specific reference to presence / absence of plants. There should be some comment here specific to other pests, suggest reference to ISPM 8 (Determination of pest status in an area).
375	The pest should be absent from all or a defined part of the PRA area.	C	Category : SUBSTANTIVE (1197) EPPO (26 Sep 2023 10:55 AM) In paragraph 377 these is specific reference to presence / absence of plants. There should be some comment here specific to other pests, suggest reference to ISPM 08 (Determination of pest status in an area)
375	The pest should be absent from all or a defined part of the PRA area.	C	(241) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:01 PM] Red - this paragraph is from section2.1.1.2 of ISPM11

377	Specific guidance on determining the presence or absence of plants as pests is provided in Annex 6.	C	(242) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:01 PM] Red - this paragraph is from section2.1.1.2 of ISPM11
380	A pest may be regulated if it is present but not widely distributed in the PRA area. However, it should be under official control or expected to be under official control in the near future. <u>'Not widely distributed'</u> is described in Supplement 1: Guidelines on the interpretation and application of the concepts of "official control" and "not widely distributed" to ISPM 5.	P	<i>Category : SUBSTANTIVE</i> (1451) European Union (27 Sep 2023 3:10 PM) Suggestion to add reference to SUPPLEMENT 1: Guidelines on the interpretation and application of the concepts of "official control" and "not widely distributed" here. Similar to how reference to Supplement 2 is included in para 390.
380	A pest may be regulated if it is present but not widely distributed in the PRA area. However, it should be under official control or expected to be under official control in the near future. <u>'Not widely distributed'</u> is described in Supplement 1: Guidelines on the interpretation and application of the concepts of "official control" and "not widely distributed" to ISPM 5	P	<i>Category : SUBSTANTIVE</i> (1198) EPPO (26 Sep 2023 10:55 AM) Suggestion to add reference to SUPPLEMENT 1: Guidelines on the interpretation and application of the concepts of "official control" and "not widely distributed" here. Similar to how reference to Supplement 2 is included in para 390).
380	A pest may be regulated if it is present but not widely distributed in the PRA area. However, it should be under official control or expected to be under official control in the near future.	C	(243) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:02 PM] Red - this text is from section2.1.1.3 of ISPM11. It is editorially revised.
382	2.1.4 Potential for establishment and spread in the PRA area	P	<i>Category : EDITORIAL</i> (1452) European Union (27 Sep 2023 3:10 PM) Better wording.
382	2.1.4 Potential for establishment and spread in the PRA area	P	<i>Category : EDITORIAL</i> (1199) EPPO (26 Sep 2023 10:55 AM) Better wording.
383	Evidence should be available to support the conclusion that the pest could become established or spread in the PRA area. The PRA area (taking account also of protected environments such as greenhouses) should have ecological and climatic conditions suitable for the establishment and spread of the pest at present or in the near future. Where relevant, host species (or near relatives), alternate hosts and vectors should be present in the PRA area.	P	<i>Category : TECHNICAL</i> (1048) Canada (22 Sep 2023 11:02 PM) For consistency in PRA , it is suggested to note climate change in pest categorization as well
383	Evidence should be available to support the conclusion that the pest could become	C	<i>Category : SUBSTANTIVE</i> (620) United States of America (7 Sep

	<p>established or spread in the PRA area. The PRA area (taking account also of protected environments such as greenhouses) should have ecological and climatic conditions suitable for the establishment and spread of the pest. Where relevant, host species (or near relatives), alternate hosts and vectors should be present in the PRA area.</p>		<p>2023 2:03 PM) These sections (2.1.4 and 2.1.5) present a potential inconsistency with ISPM 5. These sections state that there "should be clear indications that the pest is likely to have an unacceptable impact in the PRA area", and that "evidence should be available to support the conclusion that the pest could become established or spread in the PRA area." These statements suggest that strong evidence of an endangered area (i.e., an area where the pest can establish and cause economic loss) is needed to categorize a pest as a quarantine pest, which appears to contradict the ISPM 5 definitions of Pest Categorization (PC) and quarantine pest, which state that a quarantine pest simply needs to have the "potential" for economic importance to an area. Also, the above-mentioned statements seem redundant within this ISPM on PRA, as the probabilities of introduction, spread, and impacts (and therefore the determination of an "endangered area") are addressed in the next two Pest Risk Assessment steps after the PC step, i.e., "assessment of the probability of introduction and spread" and "assessment of potential consequences." Therefore, we recommend that the above-mentioned statements be removed or modified to be more in line with ISPM 5.</p>
383	<p>Evidence should be available to support the conclusion that the pest could become established or spread in the PRA area. The PRA area (taking account also of protected environments such as greenhouses) should have ecological and climatic conditions suitable for the establishment and spread of the pest. Where relevant, host species (or near relatives), <u>alternate</u>-<u>alternative</u> hosts and vectors should be present in the PRA area.</p>	P	<p><i>Category : EDITORIAL (596) Ghana (30 Aug 2023 11:59 PM)</i></p>
383	<p>Evidence should be available to support the conclusion that the pest could become established or spread in the PRA area. The PRA area (taking account also of protected environments such as greenhouses) should have ecological and climatic conditions suitable for the establishment and spread of the pest. Where relevant, host species (or near relatives), alternate hosts and vectors should be present in the</p>	C	<p>(244) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:02 PM] Red - this paragraph is from section 2.1.1.4 of ISPM11</p>

	PRA area.		
385	2.1.5 Potential consequences in the PRA area	P	<i>Category : EDITORIAL (1454) European Union (27 Sep 2023 3:12 PM)</i> Better wording.
385	2.1.5 Potential consequences in the PRA area	P	<i>Category : EDITORIAL (1200) EPPO (26 Sep 2023 10:55 AM)</i> Better wording.
385	2.1.5 Potential for economic consequences in PRA area	P	<i>Category : SUBSTANTIVE (807) COSAVE (12 Sep 2023 7:51 PM)</i> As per general comment
385	2.1.5 Potential for economic consequences in PRA area	P	<i>Category : SUBSTANTIVE (659) Uruguay (7 Sep 2023 4:21 PM)</i> As per general comment
385	2.1.5 Potential consequences in PRA area	C	(245) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:52 PM] Red – The section title is revised from section 2.1.1.5 of ISPM11 Changed from “economic consequences” to “consequences”
388	There should be clear indications that the pest is likely to have an unacceptable <u>economic impact</u> in the PRA area.	P	<i>Category : SUBSTANTIVE (808) COSAVE (12 Sep 2023 7:52 PM)</i> See general comment and consistency with the following paragraph
388	There should be clear indications that the pest is likely to have an unacceptable <u>economic impact</u> in the PRA area.	P	<i>Category : SUBSTANTIVE (660) Uruguay (7 Sep 2023 4:22 PM)</i> See general comment and consistency with the following paragraph
388	There should be clear <u>indications</u> that the pest is likely to have an unacceptable impact in the PRA area.	C	<i>Category : SUBSTANTIVE (621) United States of America (7 Sep 2023 2:04 PM)</i> See the same comment above.
388	There should be clear indications that the pest is likely to have an unacceptable impact in the PRA area.	C	(246) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:24 PM] Red - this paragraph is from section 2.1.1.5 of ISPM11
390	Unacceptable economic impact is described in Supplement 2 (<u>Guidelines on the understanding of “potential economic importance” and related terms including reference to environmental considerations</u>) (<u>Guidelines on the understanding of “potential economic importance” and related terms including reference to environmental considerations</u>) to ISPM 5.	P	<i>Category : EDITORIAL (1453) European Union (27 Sep 2023 3:11 PM)</i> Italics.

390	<p>Unacceptable economic impact is described in Supplement 2 (<i>Guidelines on the understanding of “potential economic importance” and related terms including reference to environmental considerations</i>) (<i>Guidelines on the understanding of “potential economic importance” and related terms including reference to environmental considerations</i>) to ISPM 5.</p>	P	<p>Category : EDITORIAL (1201) EPPO (26 Sep 2023 10:55 AM) Italics</p>
390	<p>Unacceptable economic impact is described in Supplement 2 (<i>Guidelines on the understanding of “potential economic importance” and related terms including reference to environmental considerations</i>) to ISPM 5.</p>	C	<p>(247) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:24 PM] Red - this paragraph is from section2.1.1.5 of ISPM11</p>
392	<p>2.2 Conclusion of pest categorization</p>	C	<p>Category : SUBSTANTIVE (1455) European Union (27 Sep 2023 3:13 PM) At this point (pest categorization), a pest either fails to satisfy criteria for a quarantine pest (and the PRA stops) or, if the pest satisfies the criteria for a quarantine pest, it continues. To avoid looking at the same pest over and over again, the reason why it fails should be recorded / documented as a reference for future assessors.</p>
392	<p>2.2 Conclusion of pest categorization</p>	C	<p>Category : SUBSTANTIVE (1202) EPPO (26 Sep 2023 10:55 AM) At this point (pest categorization), a pest either fails to satisfy criteria for a quarantine pest (and the PRA stops) or, if the pest satisfies the criteria for a quarantine pest, it continues. To avoid looking at the same pest over and over again, the reason why it fails should be recorded / documented as a reference for future assessors.</p>
393	<p>If it has been determined that the pest has the potential to be a quarantine pest, the PRA process should continue. If a pest does not fulfil all of the criteria for a quarantine pest, the PRA process for that pest may stop. In the absence of sufficient information, the uncertainties should be identified and the PRA process should continue.</p>	C	<p>(248) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:24 PM] Red - this paragraph is from section2.1.2 of ISPM11</p>
395	<p>3. Assessment of the probability of introduction and spread</p>	C	<p>Category : SUBSTANTIVE (1456) European Union (27 Sep 2023 3:14 PM) This section is called “Assessment of the probability of introduction and spread”. However, there is no mention of time. When</p>

			assessing the probability of an event the time frame over which the event is being considered should be defined. For example, the probability of X happening within one year could be very different to the probability of X happening over the next 5, 10 or 20 years. Text for a paragraph is needed to introduce time into the framework for PRA.
395	3. Assessment of the probability of introduction and spread	C	<p>Category : SUBSTANTIVE (1203) EPPO (26 Sep 2023 10:55 AM) This section is called "Assessment of the probability of introduction and spread". However, there is no mention of time. When assessing the probability of an event the time frame over which the event is being considered should be defined. For example, the probability of X happening within one year could be very different to the probability of X happening over the next 5, 10 or 20 years. Text for a paragraph is needed to introduce time into the framework for PRA.</p>
396	Pest introduction comprises both entry and establishment. To assess the probability of introduction, an analysis should be conducted of each of the pathways with which a pest may be associated from its origin to its establishment in the PRA area. In a PRA initiated by a specific pathway (usually an imported commodity), the probability of pest entry should be evaluated for the pathway in question. The probabilities for pest entry associated with other pathways should be investigated as well.	C	<p>(249) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:19 PM] Red - the paragraph is from section2. 2 of ISPM11</p>
398	For PRAs that have been initiated for a specific pest, with no particular commodity or pathway under consideration, the potential of all probable pathways should be considered.	C	<p>(250) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:19 PM] Red - the paragraph is from section2. 2 of ISPM11</p>
400	The assessment of probability of spread should be based primarily on biological considerations similar to those for entry and establishment.	C	<p>(251) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:19 PM] Red - the paragraph is from section2. 2 of ISPM11</p>
402	3.1 Probability of entry of a pest	C	<p>(252) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023</p>

			4:25 PM] Red - the paragraphs in section 3.1 is from section 2.2.1 of ISPM11
404	The probability of entry of a pest depends on the pathways from the exporting country to the destination, and the frequency and quantity of pests associated with them. <u>The In general the</u> higher the number of pathways, the greater the probability of the pest entering the PRA area.	P	<p><i>Category : EDITORIAL</i> (1458) European Union (27 Sep 2023 4:16 PM) There may be cases where a pest has many pathways, but they are all unlikely, whereas another pest may have one, which is very likely.</p>
404	The probability of entry of a pest depends on the pathways from the exporting country to the destination, and the frequency and quantity of pests associated with them. The higher the number of pathways, the greater the probability of the pest entering the PRA area.	C	<p><i>Category : SUBSTANTIVE</i> (1457) European Union (27 Sep 2023 4:14 PM) It would be better to move to section 3.1.1, as 3.1.1-3.1.4 are the subsections that describe the factors you take into account in relation to entry. The number of pathways is one of those factors.</p>
404	The probability of entry of a pest depends on the pathways from the exporting country to the destination, and the frequency and quantity of pests associated with them. The higher the number of pathways, the greater the probability of the pest entering the PRA area.	C	<p><i>Category : SUBSTANTIVE</i> (1345) EPPO (26 Sep 2023 12:24 PM) It would be better to move to section 3.1.1, as 3.1.1-3.1.4 are the subsections that describe the factors you take into account in relation to entry. The number of pathways is one of those factors.</p>
404	The probability of entry of a pest depends on the pathways from the exporting country to the destination, and the frequency and quantity of pests associated with them. <u>The In general the</u> higher the number of pathways, the greater the probability of the pest entering the PRA area.	P	<p><i>Category : EDITORIAL</i> (1204) EPPO (26 Sep 2023 10:55 AM) There may be cases where a pest has many pathways, but they are all unlikely, whereas another pest may have one, which is very likely.</p>
405	Documented pathways for the pest to enter new areas should be noted. Potential pathways, which may not currently exist, should be assessed. Pest interception data may provide evidence of the ability of a pest to be associated with a pathway and to survive in transport or storage.	C	<p><i>Category : TECHNICAL</i> (562) New Zealand (10 Aug 2023 6:43 AM) General comment; This is confusing. Assessing this means pathways that don't exist? Unless this refers to assessing a new trade request. This is an example that the standard will benefit from a full revision to reduce ambiguity in language.</p>
408	All relevant pathways should be considered. They can be identified principally in relation to the geographical distribution and host range of the pest. Consignments of plants and plant products moving in international trade are the principal pathways of concern and existing patterns of such trade will, to a substantial extent,	C	<p><i>Category : TECHNICAL</i> (563) New Zealand (10 Aug 2023 6:46 AM) General comment; this sentence should be deleted when the standard is revised. Natural spread may increase the chance of</p>

	determine which pathways are relevant. Other pathways, such as other types of commodities, packing materials, persons, baggage, mail, conveyances and the exchange of scientific material, should be considered where appropriate. Entry by natural means should also be assessed, as natural spread is likely to reduce the effectiveness of phytosanitary measures.		something arriving but doesn't mean that phytosanitary measures are less effective. Phytosanitary measures can delay the arrival of a new organism, even if it arrives eventually via natural spread e.g. wind.
408	All relevant pathways should be considered. They can be identified principally in relation to the geographical distribution and host range of the pest. Consignments of plants and plant products moving in international trade are the principal pathways of concern and existing patterns of such trade will, to a substantial extent, determine which pathways are relevant. Other pathways, such as other types of commodities, packing materials, persons, baggage, mail, conveyances and the exchange of scientific material, should be considered where appropriate. Entry by natural means should also be assessed, as natural spread is likely to reduce the effectiveness of phytosanitary measures.	C	(253) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:06 PM] Red - this paragraph is from section2.2.1.1 of ISPM11
411	The probability of the pest being associated, spatially or temporally, with the pathway at origin should be estimated. Factors that should be considered are:	C	Category : SUBSTANTIVE (1459) European Union (27 Sep 2023 4:17 PM) Is 'should' the correct level of obligation? 'May' is used in 419 for example.
411	The probability of the pest being associated, spatially or temporally, with the pathway at origin should be estimated. Factors that should be considered are:	C	Category : SUBSTANTIVE (1205) EPPO (26 Sep 2023 10:55 AM) Is 'should' the correct level of obligation? 'May' is used in 419 for example
411	The probability of the pest being associated, spatially or temporally, with the pathway at origin should be estimated. Factors that should be considered are:	C	(254) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:06 PM] Red - this paragraph is from section2.2.1.2 of ISPM11
417	pest-management, cultural and commercial procedures applied at the place of origin (application (for example application of plant-protection products, handling, culling, roguing, grading).	P	Category : EDITORIAL (1460) European Union (27 Sep 2023 4:19 PM) Improved English.
417	pest-management, cultural and commercial procedures applied at the place of origin (application (for example application of plant-protection products, handling, culling, roguing, grading).	P	Category : EDITORIAL (1206) EPPO (26 Sep 2023 10:55 AM) improved English
419	Examples of factors that may be considered are:	C	(255) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:07 PM] Red - this paragraph is from section2.2.1.3 of ISPM11

424	commercial procedures (e.g. <u>refrigeration</u>) <u>refrigeration, controlled atmospheres</u>) applied to consignments in the country of origin, country of destination, or in transport or storage.	P	Category : TECHNICAL (1461) European Union (27 Sep 2023 4:20 PM) More than one example needed when e.g. is used.
424	commercial procedures (e.g. <u>refrigeration</u>) <u>refrigeration, controlled atmospheres</u>) applied to consignments in the country of origin, country of destination, or in transport or storage.	P	Category : TECHNICAL (1207) EPPO (26 Sep 2023 10:55 AM) more than one example needed when e.g. is used
426	Existing pest-management procedures (including phytosanitary procedures) applied to consignments against other pests from origin to end use, should be evaluated for effectiveness against the pest in question. The probability that the pest will go undetected during inspection or survive other existing phytosanitary procedures should be estimated.	C	(256) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:07 PM] Red - this paragraph is from section2.2.1.4 of ISPM11
429	To estimate the probability of establishment of a pest, reliable biological information (life cycle, host range, epidemiology, survival, etc.) should be obtained from the areas where the pest is currently present. The situation in the PRA area may then be compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement used to assess the probability of establishment. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:	C	Category : SUBSTANTIVE (1464) European Union (27 Sep 2023 4:27 PM) Examples of factors that may be considered are': we noticed that (compared to the original text) in section 3 at several places where reference was made to 'factors to consider' the text has been reformulated to 'factors that should be considered' whereas 'Examples of the factors to consider are' is changed into 'examples of factors that may be considered'. Especially in [429] we wonder if the formulation should not be 'factors that should be considered' also given the text on possible factors is not just copied here and includes now also the section on the probability of transfer to a suitable host cf. [19]. More generally, it would be good to check the consistency of replacing 'factors to consider' throughout the text in which cases the formulation with may/should is most appropriate.
429	To estimate the probability of establishment of a pest, reliable biological information (<u>life-on</u> , for example, the pests' life cycle, host range, <u>epidemiology</u> , <u>survival</u> , etc.) <u>epidemiology</u> and <u>survival</u> should be obtained from the areas where the pest is currently present. The situation in the PRA area may then be compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement used to assess	P	Category : EDITORIAL (1463) European Union (27 Sep 2023 4:26 PM) Improved English.

	<p>the probability of establishment. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:</p>		
429	<p>To estimate the probability of establishment of a pest, reliable biological information (life cycle, host range, epidemiology, survival, etc.) should be obtained from the areas where the pest is currently present and whether the distribution is changing. The situation in the PRA area may then be compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement used to assess the probability of establishment. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:</p>	P	<p>Category : TECHNICAL (1462) European Union (27 Sep 2023 4:22 PM) Should other examples of assessing distribution also be included? It is not just about comparison with the current distribution of the pest, but it is also about predicting based on a pest's biology whether it is able to establish. This could include the use of modelling e.g., using day degrees and thermal thresholds.</p> <p>Suggest adding "whether the distribution is changing", as this provides useful information when estimating the probability of establishment of a pest.</p>
429	<p>To estimate the probability of establishment of a pest, reliable biological information (life-on, for example, the pests' life cycle, host range, epidemiology, survival, etc.) epidemiology and survival should be obtained from the areas where the pest is currently present and whether the distribution is changing. The situation in the PRA area may then be compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement used to assess the probability of establishment. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:</p>	P	<p>Category : EDITORIAL (1209) EPPO (26 Sep 2023 10:55 AM) Should other examples of assessing distribution also be included? It is not just about comparison with the current distribution of the pest, but it is also about predicting based on a pest's biology whether it is able to establish. This could include the use of modelling e.g., using day degrees and thermal thresholds.</p> <p>Suggest adding "whether the distribution is changing", as this provides useful information when estimating the probability of establishment of a pest.</p> <p>Improved English</p>
429	<p>To estimate the probability of establishment of a pest, reliable biological information (life cycle, host range, epidemiology, survival, etc.) should be obtained from the areas where the pest is currently present. The situation in the PRA area may then be compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement used to assess the probability of establishment. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:</p>	C	<p>Category : SUBSTANTIVE (1208) EPPO (26 Sep 2023 10:55 AM) Examples of factors that may be considered are': we noticed that (compared to the original text) in section 3 at several places where reference was made to 'factors to consider' the text has been reformulated to 'factors that should be considered' whereas 'Examples of the factors to consider are' is</p>

			changed into 'examples of factors that may be considered'. Especially in [429] we wonder if the formulation should not be 'factors that should be considered' also given the text on possible factors is not just copied here and includes now also the section on the probability of transfer to a suitable host cf. [19]. More general, it would be good to check the consistency of replacing 'factors to consider' throughout the text in which cases the formulation with may/should is most appropriate.
429	To estimate the probability of establishment of a pest, reliable biological information (life cycle, host range, epidemiology, survival, etc.) should be obtained from the areas where the pest is currently present. The situation in the PRA area may then be compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement used to assess the probability of establishment. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:	C	(257) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:08 PM] Red - this paragraph is from section 2.2.2 of ISPM11
431	availability, quantity and distribution of hosts in the PRA area;	C	<i>Category : EDITORIAL</i> (1465) European Union (27 Sep 2023 4:28 PM) This text should match the title of 3.2.1.
431	availability, quantity and distribution of hosts in the PRA area;	C	<i>Category : EDITORIAL</i> (1210) EPPO (26 Sep 2023 10:55 AM) This text should match the title of 3.2.1
431	<u>availability, quantity and distribution</u> <u>availability</u> of <u>hosts</u> <u>hosts, alternate host</u> in the PRA area; - <u>availability of vectors in the PRA area</u> ;	P	<i>Category : SUBSTANTIVE</i> (1102) APPPC (26 Sep 2023 10:36 AM) Thailand would like to add a new bullet about "availability of vectors in the PRA area" in order to cover with a detail in section of 3.2.1. Created by merging other changes together
431	availability, quantity and distribution of hosts in the PRA area; - <u>availability of vectors in the PRA area</u> ;	P	<i>Category : SUBSTANTIVE</i> (570) Thailand (16 Aug 2023 10:20 AM) Thailand would like to add a new bullet about "availability of vectors in the PRA area" in order to cover with a detail in section of 3.2.1.
431	availability, quantity and distribution of hosts in the PRA area;	C	(258) Imported Comment (30 Jun 2023

		3:20 PM) [Originally made by M.Sai on 18 May 2023 11:08 PM] Black – these factors from section2.2.2 of ISPM11 are revised (i.e., 2 factors are deleted from originally 6 factors)
433	probability of transfer to a suitable host;	C <i>Category : SUBSTANTIVE</i> (1466) European Union (27 Sep 2023 4:29 PM) As noted in the general comment, the probability of transfer is very dependent on the pathways. Some guidance should be provided on how to evaluate the probability of transfer when different commodities with different intended uses have been identified for the pest in question. There is a tendency of evaluating the probability of transfer for the worst case scenario whereas this is not a suitable approach. If one of the pathways has as an intended use of planting, then the probability of transfer is usually high. However, what if plants for planting represent a very limited part of the commodities imported and fruits the majority, how is the probability of transfer evaluated? Guidance should be given. Nothing is mentioned in section 3.2.2 (Probability of transfer to a suitable host). In the previous version of the standard, it was clear that transfer should be evaluated for the different pathways. By moving it to establishment, this is no longer that clear. Even if you continue considering part of the establishment, it is not practical to consider together with the establishment probability because the transfer is highly dependent on the pathway, which is normally not considered when assessing establishment.
433	probability of transfer to a suitable host;	C <i>Category : SUBSTANTIVE</i> (1211) EPPO (26 Sep 2023 10:55 AM) As noted in the general comment, the probability of transfer is very dependent on the pathways. Some guidance should be provided on how to evaluate the probability

			<p>of transfer when different commodities with different intended uses have been identified for the pest in question. There is a tendency of evaluating the probability of transfer for the worst case scenario whereas this is not a suitable approach. If one of the pathways has as an intended use of planting, then the probability of transfer is usually high. However, what if plants for planting represent a very limited part of the commodities imported and fruits the majority, how is the probability of transfer evaluated? Guidance should be given.</p> <p>Nothing is mentioned in section 3.2.2 (Probability of transfer to a suitable host). In the previous version of the standard, it was clear that transfer should be evaluated for the different pathways. By moving it to establishment, this is no longer that clear.</p> <p>Even if you continue considering part of the establishment, it is not practical to consider together with the establishment probability because the transfer is highly dependent on the pathway, which is normally not considered when assessing establishment.</p>
434	environmental suitability in the PRA area; and <u>- the availability of favorable environmental conditions in the PRA area</u>	P	<p><i>Category : TECHNICAL (811) COSAVE (12 Sep 2023 7:58 PM)</i> The availability of favorable environmental conditions in the ARP area should also be taken into account.</p>
434	<u>probability of adaptation to the environment</u> <u>environmental suitability</u> in the PRA area; and	P	<p><i>Category : TECHNICAL (809) COSAVE (12 Sep 2023 7:54 PM)</i> We suggest to change to the probability of adaptation" considering that the pest is absent in the area</p>
434	<u>environmental suitability</u> <u>probability of adaptation to the environment</u> in the PRA area; <u>- the availability of favorable environmental conditions in the PRA area</u> , and	P	<p><i>Category : TECHNICAL (664) Uruguay (7 Sep 2023 4:40 PM)</i> 1) We suggest to change to the probability of adaptation" considering that the pest is absent in the area, 2) the availability of favorable environmental conditions in the PRA area should also be taken into account</p>
435	cultural practices and control measures.	P	<p><i>Category : SUBSTANTIVE</i></p>

	<u>-Competition among species within the same ecology niche</u>		(1663) China (28 Sep 2023 3:20 AM) Factors that are suggested to be considered include not only the impact of natural enemies on pests, but also the possibility of species competition within the same domain after the species enters a new area.
435	cultural practices and control measures; <u>- reproductive strategy of the pest;</u> <u>- method of pest survival.</u>	P	<i>Category : TECHNICAL</i> (1467) European Union (27 Sep 2023 4:31 PM) Missing text from ISPM 11.
435	cultural practices and control measures. <u>- Reproductive strategy of the pest</u> <u>- Method of pest survival</u>	P	<i>Category : TECHNICAL</i> (1212) EPPO (26 Sep 2023 10:55 AM) Missing text from ISPM 11
435	cultural practices and control measures. <u>- pest characteristic</u>	P	<i>Category : EDITORIAL</i> (1103) APPPC (26 Sep 2023 10:36 AM) Add "pest characteristic" as other important factor for pest's probability of establishment - according to the following description in section 3.2.5
436	Other characteristics of the pest may also affect the probability of establishment. In considering probability of establishment, it should be noted that a pest with the status "present: transient" (see ISPM 8 (<i>Determination of pest status in an area</i>)) may not be able to establish in the PRA area (e.g. because of unsuitable climatic conditions) but could still have unacceptable economic consequences (see IPPC Article VII.3).	C	(259) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:10 PM] Red - this paragraph is from section2.2.2 of ISPM11
438	Specific guidance on assessing the probability of establishment of plants as pests is provided in Annex 6.	C	(260) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:11 PM] Red - this paragraph is from section2.2.2 of ISPM11
440	3.2.1 Availability of suitable hosts, alternate hosts and vectors in the PRA area	C	<i>Category : SUBSTANTIVE</i> (1104) APPPC (26 Sep 2023 10:36 AM) Remove suitable Add 3.2.2 Availability of vectors in the PRA area
441	Factors that should be considered are:	C	<i>Category : SUBSTANTIVE</i> (1469) European Union (27 Sep 2023 4:32 PM) Is 'should' the correct level of obligation? See general comments.

441	Factors that should be considered are:	C	Category : SUBSTANTIVE (1468) European Union (27 Sep 2023 4:32 PM) Is 'should' the correct level of obligation? See general comments.
441	Factors that should be considered are:	C	Category : SUBSTANTIVE (1213) EPPO (26 Sep 2023 10:55 AM) Is 'should' the correct level of obligation?
441	Factors that should be considered are:	C	(261) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:11 PM] Red - this paragraph is from section2.2.2.1 of ISPM11
444	whether hosts and alternate hosts are present within sufficient geographical proximity to allow the pest to complete its life cycle;	C	Category : TECHNICAL (1470) European Union (27 Sep 2023 4:32 PM) This paragraph would be better placed in section 3.2.2, as it is about the transfer to a host. It could be combined with paragraph 455.
444	whether hosts and alternate hosts are present within sufficient geographical proximity to allow the pest to complete its life cycle;	C	Category : TECHNICAL (1214) EPPO (26 Sep 2023 10:55 AM) This paragraph would be better placed in section 3.2.2, as it is about the transfer to a host. It could be combined with paragraph 455.
446	whether a vector, if needed for dispersal of the pest, is already present in the PRA area or likely to be introduced; and	C	Category : SUBSTANTIVE (1105) APPPC (26 Sep 2023 10:36 AM) To include in 3.2.2 Availability of vectors in the PRA area.
447	whether another vector species is present in the PRA area.	C	Category : SUBSTANTIVE (1106) APPPC (26 Sep 2023 10:36 AM) To include in 3.2.2 Availability of vectors in the PRA area
448	The taxonomic level at which hosts are considered should normally be the species. The use of a higher or lower taxonomic level should be justified by a scientifically sound rationale.	C	(262) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:11 PM] Red - this paragraph is from section2.2.2.1 of ISPM11
450	3.2.2 Probability of transfer to a suitable host	C	Category : SUBSTANTIVE (1471) European Union (27 Sep 2023 4:35 PM) See general comment and comment on paragraph 433. The need to balance the risk from the

			different commodities should be stated.
450	3.2.2 Probability of transfer to a suitable host	C	<i>Category : SUBSTANTIVE (1215) EPPO (26 Sep 2023 10:55 AM)</i> See general comment and comment on paragraph 433. The need to balance the risk from the different commodities should be stated.
450	3.2.2 Probability of transfer to a suitable host	C	<i>Category : SUBSTANTIVE (622) United States of America (7 Sep 2023 2:05 PM)</i> Consider using the approved Specification meant for an Annex to ISPM 11 to cover the necessary aspects of this section.
450	3.2.2 Probability of transfer to a suitable host	C	(263) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:12 PM] Red - "Probability of transfer to a suitable host" is moved to under "Probability of establishment" from "Probability of entry of a pest" but the texts are not revised
452	Factors that should be considered are:	C	<i>Category : SUBSTANTIVE (1472) European Union (27 Sep 2023 4:35 PM)</i> Is 'should' the correct level of obligation? See our general comment on this issue.
452	Factors that should be considered are:	C	<i>Category : SUBSTANTIVE (1216) EPPO (26 Sep 2023 10:55 AM)</i> Is 'should' the correct level of obligation? See our general comment on this issue.
455	proximity of entry, transit and destination points to suitable hosts <u>hosts and alternate hosts that allow the pest to complete its life cycle;</u>	P	<i>Category : TECHNICAL (1473) European Union (27 Sep 2023 4:36 PM)</i> See our comment on paragraph 444.
455	proximity of entry, transit and destination points to suitable hosts <u>hosts and alternate hosts that allow the pest to complete its life cycle;</u>	P	<i>Category : TECHNICAL (1217) EPPO (26 Sep 2023 10:55 AM)</i> See our comment on paragraph 444
458	<u>risks</u> -escape of pests to a suitable host from by-products and waste.	P	<i>Category : EDITORIAL (1474) European Union (27 Sep 2023 4:38 PM)</i> Improved English.
458	<u>Escape of pests to a suitable host</u> <u>risks</u> - from by-products and waste.	P	<i>Category : EDITORIAL (1218) EPPO (26 Sep 2023 10:55 AM)</i> Improved English
461	Factors in the environment (e.g. suitability of climate <u>current and future projected</u>	P	<i>Category : TECHNICAL</i>

	<p><u>climates, soil, pest–host competition</u>) that are critical to the development of the pest, its host and if applicable its vector, and to their ability to survive periods of climatic stress and complete their life cycles, should be identified. It should be noted that the environment is likely to have different effects on the pest, its host and its vector. This needs to be recognized in determining whether the interaction between these organisms in the area of origin is maintained in the PRA area to the benefit or detriment of the pest. The probability of establishment in a protected environment, such as in greenhouses, should also be considered.</p>		<p>(1043) Canada (22 Sep 2023 10:31 PM) The suggested addition would be similar to current text in Section 6, Section 4.7, first bullet</p>
461	<p><u>Factors</u> in the environment (e.g. suitability of climate, soil, pest–host competition) that are critical to the development of the pest, its host and if applicable its vector, and to their ability to survive periods of climatic stress and complete their life cycles, should be identified. It should be noted that the environment is likely to have different effects on the pest, its host and its vector. This needs to be recognized in determining whether the interaction between these organisms in the area of origin is maintained in the PRA area to the benefit or detriment of the pest. The probability of establishment in a protected environment, such as in greenhouses, should also be considered.</p>	C	<p>(264) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2 of ISPM11</p>
463	<p><u>Climate</u> data from the known distribution of a pest can be compared with that for the PRA area to inform judgments. If appropriate, climate change may also be considered. <u>modelling systems may be used to compare climatic data on the known distribution of a pest with that for the PRA area.</u></p>	P	<p>Category : <i>SUBSTANTIVE</i> (1475) European Union (27 Sep 2023 4:40 PM) Better reflects what does/should happen already. We suggest mentioning that past climatic data may not adequately reflect current and future risk due to climate change. Should other models be included? These could include ones that are not just based on comparison with the present distribution e.g., use of thermal thresholds and day degrees based on laboratory data.</p>
463	<p>Climatic modelling systems may be used to compare climatic data on the known distribution of a pest with that for the PRA area. <u>Projections of future climate data may also be used by other models to stimulate a corridor of possible outcomes of vegetation and pest dynamics.</u></p>	P	<p>Category : <i>TECHNICAL</i> (1044) Canada (22 Sep 2023 10:33 PM) The suggested additional text is similar to the one included in the FG CCPI report</p>
463	<p><u>Climate data from the known distribution of a pest can be compared with that for the PRA area to inform judgments. If appropriate climate change may also be</u></p>	P	<p>Category : <i>SUBSTANTIVE</i> (1219) EPPO (26 Sep 2023 10:55 AM) Better reflects what does/should happen</p>

	considered. Climatic modelling systems may be used to compare climatic data on the known distribution of a pest with that for the PRA area.		already. We suggest mentioning that past climatic data may not adequately reflect current and future risk due to climate change. Should other models be included? These could include ones that are not just based on comparison with the present distribution e.g., use of thermal thresholds and day degrees based on laboratory data.
463	Climatic modelling systems may be used to compare climatic data on the known distribution of a pest with that for the PRA area.	C	(265) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2.2 of ISPM11
466	Where applicable, practices employed during the production (including cultivation) of the host crops should be compared to determine if there are differences in such practices between the PRA area and the origin of the pest that may influence its ability to establish.	C	(266) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2.3 of ISPM11
468	Pest control programmes or natural enemies already in the PRA area that reduce the probability of establishment may be considered. Pests for which control is not feasible should be considered to pose a greater pest risk than those for which treatment is feasible control programmes are easily accomplished. The availability (or lack) of suitable methods for eradication should also be considered.	P	Category : SUBSTANTIVE (1477) European Union (27 Sep 2023 4:43 PM) 1) Improved drafting; 2) Second sentence changed to cover control programmes rather than just control treatments.
468	Pest control programmes or natural enemies already in the PRA area that reduce the probability of establishment may be considered. Pests for which control is not feasible should be considered to pose a greater pest risk than those for which treatment is easily accomplished. The availability (or lack) of suitable methods for eradication should also be considered.	C	Category : SUBSTANTIVE (1476) European Union (27 Sep 2023 4:41 PM) General comment: Is this sentence in the right place? Such measures are implemented in case of an outbreak and should only be considered in the risk management stage.
468	Pest control programmes or natural enemies already in the PRA area that reduce the probability of establishment may be considered. Pests for which control is not feasible should be considered to pose a greater pest risk than those for which treatment is easily accomplished. The availability (or lack) of suitable methods for eradication should also be considered.	C	Category : SUBSTANTIVE (1221) EPPO (26 Sep 2023 10:55 AM) General comment: Is this sentence at the right place? Such measures are implemented in case of an outbreak and should only be considered in the risk management stage.
468	Pest control programmes or natural enemies already in the PRA area that reduce	P	Category : SUBSTANTIVE (1220) EPPO (26 Sep 2023 10:55 AM)

	<p>the probability of establishment may be considered. Pests for which control is not feasible should be considered to pose a greater pest risk than those for which treatment is feasible control programmes are easily accomplished. The availability (or lack) of suitable methods for eradication should also be considered.</p>		1) improved drafting 2) second sentence changed to cover control programmes rather than just control treatments
468	<p>Pest control programmes or natural enemies already in the PRA area that reduce the probability of establishment may be considered. Pests for which control is not feasible should be considered to pose a greater pest risk than those for which treatment is easily accomplished. The availability (or lack) of suitable methods for eradication should also be considered.</p>	C	(267) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2.3 of ISPM11
470	3.2.5 Other Pest characteristics	P	Category : EDITORIAL (1108) APPPC (26 Sep 2023 10:36 AM)
470	3.2.5 Other characteristics	C	Category : EDITORIAL (1107) APPPC (26 Sep 2023 10:36 AM) Other Pest Characteristics
471	<p>Other characteristics of the pest affecting the probability of establishment include the following:</p>	C	(268) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:16 PM] Red - this paragraph is from section2.2.2.4 of ISPM11
473	<p><i>Reproductive strategy of the pests and method of pest survival.</i> Characteristics that enable the pest to reproduce effectively in the new environment, such as parthenogenesis (asexual reproduction (e.g. parthenogenesis, self-crossing), duration of the life cycle, number of generations per year, and resting stage, should be identified.</p>	P	Category : EDITORIAL (1478) European Union (27 Sep 2023 4:45 PM) Improved drafting.
473	<p><i>Reproductive strategy of the pests and method of pest survival.</i> Characteristics that enable the pest to reproduce effectively in the new environment, such as parthenogenesis (asexual reproduction (e.g. parthenogenesis, self-crossing), duration of the life cycle, number of generations per year, and resting stage, should be identified.</p>	P	Category : EDITORIAL (1222) EPPO (26 Sep 2023 10:55 AM) Improved drafting
474	<p><i>Genetic adaptability.</i> Whether the species is polymorphic and the degree to which the pest has demonstrated the ability to adapt to conditions outside of its native range or like those in the PRA area should be considered (e.g. host-specific races or races adapted to a wider range of habitats or to new hosts). This genotypic (and phenotypic) variability facilitates a pest's ability to withstand environmental fluctuations, to adapt to a wider range of habitats, to develop pesticide resistance and to overcome host resistance.</p>	P	Category : SUBSTANTIVE (1479) European Union (27 Sep 2023 4:47 PM) Better reflects what does/should already happen.

474	<p><i>Genetic adaptability.</i> Whether the species is polymorphic and the degree to which the pest has demonstrated the ability to adapt to conditions <u>outside of its native range, or</u> like those in the PRA area should be considered (e.g. host-specific races or races adapted to a wider range of habitats or to new hosts). This genotypic (and phenotypic) variability facilitates a pest's ability to withstand environmental fluctuations, to adapt to a wider range of habitats, to develop pesticide resistance and to overcome host resistance.</p>	P	<p><i>Category : SUBSTANTIVE (1223) EPPO (26 Sep 2023 10:55 AM)</i> better reflects what does/should already happen</p>
475	<p><i>Minimum population needed for establishment.</i> If possible, the threshold population that is required for establishment should be estimated.</p> <p><u>- tolerance or resistance: response to pesticides, cultural practices, drought, flooding, salinity, climate changes</u></p>	P	<p><i>Category : TECHNICAL (1045) Canada (22 Sep 2023 10:35 PM)</i> The suggested additional bullet is similar to the last bullet of Annex 6, Section 4.7</p>
476	<p>3.3 Probability of spread after establishment</p>	C	<p><i>Category : SUBSTANTIVE (1480) European Union (27 Sep 2023 4:48 PM)</i> The element of time should also be taken into account in this section (i.e. the extent of spread in the given time frame considered by the PRA). This section is called "Probability of spread after establishment". However, all pests must be able to spread, even if only very small distances, or very slowly. The question to consider is not how probable is it that the pest will spread, but given that it has established how far will the pest spread?</p>
476	<p>3.3 Probability of spread after establishment</p>	C	<p><i>Category : SUBSTANTIVE (1224) EPPO (26 Sep 2023 10:55 AM)</i> The element of time should also be taken into account in this section (i.e. the extent of spread in the given time frame considered by the PRA). This section is called "Probability of spread after establishment". However, all pests must be able to spread, even if only very small distances, or very slowly. The question to consider is not how probable is it that the pest will spread, but given that it has established how far will the pest spread?</p>
477	<p>A pest with a high potential for spread may also have a high potential for establishment, and possibilities for its successful containment or eradication are</p>	P	<p><i>Category : SUBSTANTIVE (1482) European Union (27 Sep 2023 4:51 PM)</i></p>

	<p>more limited. To estimate the probability of spread of the pest, reliable biological information should be obtained from areas where the pest is currently present. The situation in the PRA area may then be carefully compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement may be used to assess the probability <u>and extent of spread</u> within the PRA area and within the timeframe being considered. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:</p>		Better reflects what does/should already happen.
477	<p>A pest with a high potential for <u>spread establishment</u> may also have a high potential for <u>spread after establishment</u>, and possibilities for its successful containment or eradication are more limited. To estimate the probability of spread of the pest, reliable biological information should be obtained from areas where the pest is currently present. The situation in the PRA area may then be carefully compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement may be used to assess the probability of spread. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:</p>	P	<p><i>Category : TECHNICAL (1481) European Union (27 Sep 2023 4:50 PM)</i> This is more logical, given the preceding section is about establishment and this section is about spread. Otherwise the first sentence could be replaced with: "If a pest has a high potential for spread, possibilities for its successful containment or eradication are more limited."</p>
477	<p>A pest with a high potential for <u>spread establishment</u> may also have a high potential for <u>spread after establishment</u>, and possibilities for its successful containment or eradication are more limited. To estimate the probability of spread of the pest, reliable biological information should be obtained from areas where the pest is currently present. The situation in the PRA area may then be carefully compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement may be used to assess the probability <u>and extent of spread</u> within the PRA area and within the timeframe being considered. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:</p>	P	<p><i>Category : SUBSTANTIVE (1225) EPPO (26 Sep 2023 10:55 AM)</i> This is more logical, given the preceding section is about establishment and this section is about spread. Otherwise the first sentence could be replaced with: "If a pest has a high potential for spread, possibilities for its successful containment or eradication are more limited." Better reflects what does/should already happen</p>
477	<p>A pest with a high potential for spread may also have a high potential for establishment, and possibilities for its successful containment or eradication are more limited. To estimate the probability of spread of the pest, reliable biological information should be obtained from areas where the pest is currently present. The situation in the PRA area may then be carefully compared with that in the areas where the pest is currently present (taking account also of protected environments such as greenhouses) and expert judgement may be used to assess the probability</p>	C	<p>(269) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:16 PM] Red - this paragraph is from section2.2.3 of ISPM11</p>

	of spread. Case histories concerning comparable pests can usefully be considered. Examples of factors that may be considered are:		
479	suitability of the natural or managed environment for natural spread of the pest;	C	<p><i>Category : SUBSTANTIVE (1483) European Union (27 Sep 2023 4:51 PM)</i></p> <p>Add a bullet point on the biology of the pest. This will be an important factor for the assessment of spread potential.</p>
479	suitability of the natural or managed environment for natural spread of the pest;	C	<p><i>Category : SUBSTANTIVE (1226) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Add a bullet point on the biology of the pest. This will be an important factor for the assessment of spread potential.</p>
479	suitability of the natural or managed environment for natural spread of the pest; <u>- changes in climate (e.g. warmer climate, changes in precipitation patterns)</u>	P	<p><i>Category : TECHNICAL (1047) Canada (22 Sep 2023 10:45 PM)</i></p> <p>By moving this bullet from Annex 6 to Annex , this would become part of guidance on pest risk assessment for all pests rather than a special consideration for plants as pests.</p>
485	Specific guidance on assessing the probability of spread of plants as pests is provided in Annex 6.	C	<p>(270) Imported Comment (30 Jun 2023 3:20 PM)</p> <p>[Originally made by M.Sai on 18 May 2023 11:16 PM] Red - this paragraph is from section2.2.3 of ISPM11</p>
487	The information on probability <u>and extent</u> of spread is used to estimate how rapidly a pest's potential economic importance may be expressed within the PRA area. This also has significance if the pest is liable to enter and establish in an area where it may be of low potential economic importance and then spread to an area where it may be of high potential economic importance. In addition, it may be important in the risk management stage when considering the feasibility of containment or eradication of an introduced pest.	P	<p><i>Category : TECHNICAL (1484) European Union (27 Sep 2023 4:53 PM)</i></p> <p>Better reflects what does/should already happen.</p>
487	The information on probability <u>and extent</u> of spread is used to estimate how rapidly a pest's potential economic importance may be expressed within the PRA area. This also has significance if the pest is liable to enter and establish in an area where it may be of low potential economic importance and then spread to an area where it may be of high potential economic importance. In addition, it may be important in the risk management stage when considering the feasibility of containment or eradication of an introduced pest.	P	<p><i>Category : TECHNICAL (1227) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>better reflects what does/should already happen</p>
487	The information on probability of spread is used to estimate how rapidly a pest's	P	<i>Category : EDITORIAL</i>

	<p>potential economic importance may be expressed within the PRA area. This also has significance if the pest is liable to enter and establish in an area where it may be of low potential economic importance and then spread to an area where it may be of high potential economic importance. In addition, it may be important in the <u>pest</u> risk management stage when considering the feasibility of containment or eradication of an introduced pest.</p>		(1109) APPPC (26 Sep 2023 10:36 AM) Add "pest risk management" for terminology consistency
487	<p>The information on probability of spread is used to estimate how rapidly a pest's potential economic importance may be expressed within the PRA area. This also has significance if the pest is liable to enter and establish in an area where it may be of low potential economic importance and then spread to an area where it may be of high potential economic importance. In addition, it may be important in the risk management stage when considering the feasibility of containment or eradication of an introduced pest.</p>	C	(271) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from section2.2.3 of ISPM11
489	<p>Certain pests may not cause injurious effects on plants immediately after they establish, and in particular may only spread after a certain time. In assessing the probability of spread, this should be considered, based on evidence of such behaviour.</p>	C	(272) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from section2.2.3 of ISPM11
492	<p>The overall probability of introduction and spread should be expressed in terms most suitable for the data, the methods used for analysis, and the intended audience. This may be quantitative or qualitative, since either output is in any case probability of both introduction and spread may be the result of a combination of both quantitative and qualitative information. The probability of introduction and spread may be expressed as a comparison with that obtained from PRAs on other pests.</p>	P	<i>Category : EDITORIAL</i> (1485) European Union (27 Sep 2023 4:54 PM) Improved drafting.
492	<p>The overall probability of introduction and spread should be expressed in terms most suitable for the data, the methods used for analysis, and the intended audience. This may be quantitative or qualitative, since either output is in any case probability of both introduction and spread may be the result of a combination of both quantitative and qualitative information. The probability of introduction and spread may be expressed as a comparison with that obtained from PRAs on other pests.</p>	P	<i>Category : EDITORIAL</i> (1228) EPPO (26 Sep 2023 10:55 AM) Improved drafting
492	<p>The overall probability of introduction and spread should be expressed in terms most suitable for the data, the methods used for analysis, and the intended audience. This may be quantitative or qualitative, since either output is in any case</p>	C	(273) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from

	<p>the result of a combination of both quantitative and qualitative information. The probability of introduction and spread may be expressed as a comparison with that obtained from PRAs on other pests.</p>		section2.2.4 of ISPM11
494	<p>The part of the PRA area where ecological factors favour the establishment of the pest should be identified in order to help define the endangered area. This may be the <u>whole of the PRA area</u>, or a <u>part</u> of the <u>PRA area</u>.</p>	P	<p>Category : EDITORIAL (1486) European Union (27 Sep 2023 4:57 PM) Improved drafting.</p>
494	<p>The part of the PRA area where ecological factors favour the establishment of the pest should be identified in order to help define the endangered area. This may be the <u>whole of the PRA area</u>, or a <u>part</u> of the <u>PRA area</u>.</p>	P	<p>Category : EDITORIAL (1229) EPPO (26 Sep 2023 10:55 AM) Improved drafting</p>
494	<p>The part of the PRA area where ecological factors favour the establishment of the pest should be identified in order to help define the endangered area. This may be the whole of the PRA area or a part of the area.</p>	C	<p>(274) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from section2.2.4.1 of ISPM11</p>
496	<p>4. Assessment of potential <u>economic</u> consequences</p>	P	<p>Category : SUBSTANTIVE (812) COSAVE (12 Sep 2023 7:58 PM) See general comment</p>
496	<p>4. Assessment of potential <u>economic</u> consequences</p>	P	<p>Category : SUBSTANTIVE (665) Uruguay (7 Sep 2023 4:44 PM) See general comment</p>
497	<p>In PRA, consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term “economic effects” provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and environmental analyses, that may not use monetary terms. Economic <u>impact</u> is <u>impacts</u> are described in Supplement 2 to ISPM 5.</p>	P	<p>Category : EDITORIAL (1688) Australia (29 Sep 2023 5:57 AM) Change to plural as there are more than 1 economic consequence.</p>
497	<p>In PRA, consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term “economic effects” provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services.</p>	P	<p>Category : SUBSTANTIVE (1489) European Union (27 Sep 2023 5:09 PM) 1) Improved drafting 2) See other comments on including economic factors, including those in our general comments. This section is redundant, and also mostly</p>

	This does not preclude the use of other tools, such as qualitative and environmental analyses, that may not use monetary terms. Economic <u>impact</u> impact, in its widest sense , is described in Supplement 2 to ISPM 5.		copied from ISPM 5 supplement 2 part 4.1, but with the change of the first 'economic effects' by 'consequences' (although not in the third sentence). It is also another illustration of the problem with the change of interpretation proposed for 'economic' consequences.
497	In PRA, consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term "economic effects" provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and <u>environmental other types of</u> analyses, that may not use monetary terms. Economic impact is described in Supplement 2 to ISPM 5.	P	<p><i>Category : TECHNICAL</i> (1488) European Union (27 Sep 2023 5:06 PM) There are many types of analysis of consequences and not only related to the environment.</p>
497	In PRA, consequences should not be interpreted to be <u>only-restricted to</u> economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term "economic effects" provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and environmental analyses, that may not use monetary terms. Economic impact is described in Supplement 2 to ISPM 5.	P	<p><i>Category : EDITORIAL</i> (1487) European Union (27 Sep 2023 5:04 PM) Better wording.</p>
497	In PRA, consequences should not be interpreted to be <u>only-restricted to</u> economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term "economic effects" provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and <u>environmental other types of</u> analyses, that may not use monetary terms. Economic	P	<p><i>Category : SUBSTANTIVE</i> (1230) EPPO (26 Sep 2023 10:55 AM) Better wording.</p> <p>There are many types of analysis of consequences and not only related to the environment (see other comments on including economic factors, including those in our general comments).</p> <p>This section is redundant, and also mostly copied from ISPM 5 supplement 2 part 4.1,</p>

	<u>impact</u> , in its widest sense, is described in Supplement 2 to ISPM 5.		but with the change of the first 'economic effects' by 'consequences' (although not in the third sentence). It is also another illustration of the problem with the change of interpretation proposed for 'economic' consequences.
497	In PRA, consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have <u>economic less</u> value, and economic analysis encompasses much more than the study of market goods and services. The use of the term "economic effects" provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and environmental analyses, that may not use monetary terms. Economic impact is described in Supplement 2 to ISPM 5.	P	Category : TECHNICAL (1093) Eswatini (26 Sep 2023 9:00 AM)
497	In PRA, consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term "economic effects" provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and environmental analyses, that may not use monetary terms. <u>Economic impact is described in The</u> Supplement 2 to ISPM 5., <u>provides guidance on the interpretation of "potential</u> <u>economic importance"</u> and related terms including reference to environmental <u>cosiderations</u>	P	Category : TECHNICAL (814) COSAVE (12 Sep 2023 8:00 PM) Text added for consistency with Supplement 2 to ISPM 5
497	In PRA, <u>economic</u> consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term "economic effects" provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and	P	Category : TECHNICAL (813) COSAVE (12 Sep 2023 7:59 PM) See general comment

	environmental analyses, that may not use monetary terms. Economic impact is described in Supplement 2 to ISPM 5.		
497	In PRA, <u>economic</u> consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term “economic effects” provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and environmental analyses, that may not use monetary terms. <u>Economic impact is described in The Supplement 2 to ISPM 5.provides guidance on the interpretation of “potential economic importance” and related terms”including reference to environmental cosiderations</u>	P	<p><i>Category : TECHNICAL</i></p> <p>(666) Uruguay (7 Sep 2023 5:33 PM) ! See general comment, 2) Text added for consistency with Supplement 2 to ISPM 5</p>
497	In PRA, consequences should not be interpreted to be only economic market effects. Goods and services not sold in commercial markets can have economic value, and economic analysis encompasses much more than the study of market goods and services. The use of the term “economic effects” provides a framework in which a wide variety of effects (including environmental and social effects) may be analysed. Economic analysis uses a monetary value as a measure to allow policy makers to compare costs and benefits from different types of goods and services. This does not preclude the use of other tools, such as qualitative and environmental analyses, that may not use monetary terms. Economic impact is described in Supplement 2 to ISPM 5.	C	<p>(275) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:19 PM] Black – new text</p>
499	4.1 Consequences	C	<p><i>Category : TECHNICAL</i></p> <p>(1491) European Union (27 Sep 2023 5:11 PM) Elaborate a bit more on the heading, such as “Consequences following the introduction of the pest”.</p>
499	4.1 Consequences	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(1490) European Union (27 Sep 2023 5:10 PM) It would be useful to have a paragraph describing that consequences should be assessed in the current distribution of the pest and the predicted consequences in the PRA area.</p>

			Add a para 504 bis along the lines of "A PRA should consider consequences in regions of the world where the pest currently occurs and the expected consequences in the PRA area."
499	4.1 Consequences	C	<p><i>Category : TECHNICAL (1232) EPPO (26 Sep 2023 10:55 AM)</i> Elaborate a bit more on the heading, such as "Consequences following the introduction of the pest".</p>
499	4.1 Consequences	C	<p><i>Category : SUBSTANTIVE (1231) EPPO (26 Sep 2023 10:55 AM)</i> It would be useful to have a paragraph describing that consequences should be assessed in the current distribution of the pest and the predicted consequences in the PRA area.</p> <p>Add a para 504 bis along the lines of "A PRA should consider consequences in regions of the world where the pest currently occurs and the expected consequences in the PRA area."</p>
499	4.1 Consequences	P	<p><i>Category : TECHNICAL (815) COSAVE (12 Sep 2023 8:01 PM)</i> See general comment</p>
499	4.1 Consequences	P	<p><i>Category : TECHNICAL (667) Uruguay (7 Sep 2023 5:34 PM)</i> See general comment</p>
499	4.1 Consequences	C	<p>(276) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 4:38 PM] Red – the section title is from section2.3 of ISPM11. Changed "Assessment of potential economic consequences" to "Consequences"</p>
501	Requirements described in this step indicate what information relative to the pest and its potential host plants should be assembled, and suggest levels of economic analysis that may be carried out using that information in order to assess all the effects of the pest (i.e. the potential <u>economic</u> , <u>environment</u> and <u>social</u> consequences). Wherever appropriate, quantitative data that will provide monetary values should be obtained. Qualitative data may also be used. Consultation with an	P	<p><i>Category : SUBSTANTIVE (1492) European Union (27 Sep 2023 5:12 PM)</i> See other comments on including economic and other factors, including those in our general comments.</p>

	economist may be useful.		
501	Requirements described in this step indicate what information relative to the pest and its potential host plants should be assembled, and suggest levels of economic analysis that may be carried out using that information in order to assess all the effects of the pest (i.e. the potential <u>economic</u> , <u>environment and social</u> <u>environment and social</u> consequences). Wherever appropriate, quantitative data that will provide monetary values should be obtained. Qualitative data may also be used. Consultation with an economist may be useful.	P	<p><i>Category : SUBSTANTIVE</i> (1233) EPPO (26 Sep 2023 10:55 AM) See other comments on including economic and other factors, including those in our general comments.</p>
501	Requirements described in this step indicate what information relative to the pest and its potential host plants should be assembled, and suggest levels of economic analysis that may be carried out using that information in order to assess all the effects of the pest (i.e. the potential economic consequences). Wherever appropriate, quantitative data that will provide monetary values should be obtained. Qualitative data may also be used. Consultation with an economist may be useful.	C	<p>(277) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:20 PM] Red – the paragraph is from section2.3 of ISPM11</p>
503	In many instances, detailed analysis of the estimated economic consequences is not necessary if there is sufficient evidence or it is widely agreed that the introduction of a pest will have unacceptable economic consequences (including environmental consequences). In such cases, pest risk assessment may primarily focus on the probability of introduction and spread. Economic factors should, however, be examined in greater detail when the level of economic consequences is in question, or when the level of economic consequences needs to be known to evaluate the strength of measures used to manage pest risk or in assessing the cost-benefit of exclusion or control.	C	<p>(278) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3 of ISPM11</p>
505	Specific guidance on assessing the potential <u>economic</u> consequences of plants as pests is provided in Annex 6.	P	<p><i>Category : SUBSTANTIVE</i> (1493) European Union (27 Sep 2023 5:14 PM) Only economic? See general comment on 'consequences'.</p>
505	Specific guidance on assessing the potential economic consequences of plants as pests is provided in Annex 6.	C	<p><i>Category : SUBSTANTIVE</i> (1234) EPPO (26 Sep 2023 10:55 AM) Only economic? See general comment on 'consequences'.</p>
505	Specific guidance on assessing the potential economic consequences of plants as pests is provided in Annex 6.	C	<p>(279) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3 of ISPM11</p>

508	To estimate the potential economic importance of the pest, information should be obtained from areas where the pest is present naturally or has been introduced. This information should be compared with the situation in the PRA area. Case histories concerning comparable pests can usefully be considered. The effects considered may be direct or indirect.	P	Category : SUBSTANTIVE (1494) European Union (27 Sep 2023 5:15 PM) Only economic? See general comment on 'consequences'.
508	To estimate the potential economic importance of the pest, information should be obtained from areas where the pest is present naturally or has been introduced. This information should be compared with the situation in the PRA area. Case histories concerning comparable pests can usefully be considered. The effects considered may be direct or indirect.	C	Category : SUBSTANTIVE (1235) EPPO (26 Sep 2023 10:55 AM) Only economic? See general comment on 'consequences'.
508	To estimate the potential economic importance of the pest, information should be obtained from areas where the pest is present naturally or has been introduced. This information should be compared with the situation in the PRA area. Case histories concerning comparable pests can usefully be considered. The effects considered may be direct or indirect.	C	(280) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3.1 of ISPM11
510	The basic method for estimating the potential economic importance of pests described in this section also applies to:	C	(281) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3.1 of ISPM11
512	pests affecting uncultivated or unmanaged plants;	C	Category : EDITORIAL (1495) European Union (27 Sep 2023 5:16 PM) Consistency with the term "wild".
512	pests affecting uncultivated or unmanaged plants;	C	Category : EDITORIAL (1236) EPPO (26 Sep 2023 10:55 AM) Consistency with the term "wild"
515	The environmental effects and consequences considered should be those that result from the effects of the pest on plants. Such effects on plants, however, may be less significant than the effects or consequences on other organisms or systems. For example, a plant as a pest that has only a minor impact on other plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock. However, the regulation of plants solely on the basis of their effects on other organisms or systems (e.g. on human or animal health) is outside the scope of this standard. If the PRA process reveals evidence of a potential danger to other organisms or systems, this should be communicated to the appropriate authorities that have the legal responsibility to deal with the issue.	C	Category : SUBSTANTIVE (1497) European Union (27 Sep 2023 5:17 PM) See earlier comment on paragraph 171. If the suggested edit is made to 171 then much of the text currently in 515 is redundant and can be removed, or summarised.

515	<p>The environmental effects and consequences considered should be those that result from the effects of the pest on plants. Such effects on plants, however, may be less significant than the effects or consequences on other organisms or systems. For example, a plant as a pest that has only a minor impact on other plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock. However, the regulation of plants solely on the basis of their effects on other organisms or systems (e.g. on human or animal health) is outside the scope of this standard. If the PRA process reveals evidence of a potential danger to other organisms or systems, this should be communicated to the appropriate authorities that have the legal responsibility to deal with the issue.</p>	C	<p><i>Category : TECHNICAL (1496) European Union (27 Sep 2023 5:17 PM)</i> Is it only this standard or all ISPMs in general and more broadly IPPC?</p>
515	<p>The environmental effects and consequences considered should be those that result from the effects of the pest on plants. Such effects on plants, however, may be less significant than the effects or consequences on other organisms or systems. For example, a plant as a pest that has only a minor impact on other plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock. However, the regulation of plants solely on the basis of their effects on other organisms or systems (e.g. on human or animal health) is outside the scope of this standard. If the PRA process reveals evidence of a potential danger to other organisms or systems, this should be communicated to the appropriate authorities that have the legal responsibility to deal with the issue.</p>	C	<p><i>Category : TECHNICAL (1238) EPPO (26 Sep 2023 10:55 AM)</i> Is this only this standard or all ISPMs in general and more broadly IPPC?</p>
515	<p>The environmental effects and consequences considered should be those that result from the effects of the pest on plants. Such effects on plants, however, may be less significant than the effects or consequences on other organisms or systems. For example, a plant as a pest that has only a minor impact on other plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock. However, the regulation of plants solely on the basis of their effects on other organisms or systems (e.g. on human or animal health) is outside the scope of this standard. If the PRA process reveals evidence of a potential danger to other organisms or systems, this should be communicated to the appropriate authorities that have the legal responsibility to deal with the issue.</p>	C	<p><i>Category : SUBSTANTIVE (1237) EPPO (26 Sep 2023 10:55 AM)</i> See earlier comment on paragraph 171. If the suggested edit is made to 171 then much of the text currently in 515 is redundant and can be removed, or summarised</p>
515	<p>The environmental effects and consequences considered should be those that result from the effects of the pest on plants. Such effects on plants, however, may be less significant than the effects or consequences on other organisms or systems. For example, a plant as a pest that has only a minor impact on other plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins</p>	C	<p>(282) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:22 PM] Red – the paragraph is from section 2.3.1 of ISPM11</p>

	that seriously affect livestock. However, the regulation of plants solely on the basis of their effects on other organisms or systems (e.g. on human or animal health) is outside the scope of this standard. If the PRA process reveals evidence of a potential danger to other organisms or systems, this should be communicated to the appropriate authorities that have the legal responsibility to deal with the issue.		
517	4.1.2 Direct pest effects	C	<p><i>Category : SUBSTANTIVE</i> (1498) European Union (27 Sep 2023 5:19 PM) It would help if "direct pest" and "direct pest effects" could be explained here. One interpretation of a direct pest is a pest that harms the marketed part of a plant. Direct pest effects are therefore losses in yield and quality for example.</p>
517	4.1.2 Direct pest effects	C	<p><i>Category : SUBSTANTIVE</i> (1239) EPPO (26 Sep 2023 10:55 AM) It would help if "direct pest" and "direct pest effects" could be explained here. One interpretation of a direct pest is a pest that harms the marketed part of a plant. Direct pest effects are therefore losses in yield and quality for example.</p>
517	4.1.2 1.1 Direct pest effects	P	<p><i>Category : EDITORIAL</i> (1079) Canada (25 Sep 2023 4:24 PM) Changing numbering of the heading</p>
518	For identification and characterization of the direct effects of the pest on each potential host in the PRA area, or those effects that are host-specific, the following are examples of factors that may be considered:	C	<p><i>Category : TECHNICAL</i> (1499) European Union (27 Sep 2023 5:21 PM) We suggest that it is better to say "on each potential host species", since this does not refer to the individual plant.</p>
518	For identification and characterization of the direct effects of the pest on each potential host in the PRA area, or those effects that are host-specific, the following are examples of factors that may be considered:	C	<p><i>Category : TECHNICAL</i> (1240) EPPO (26 Sep 2023 10:55 AM) We suggest too that it is better to say "on each potential host species" , since this does not refer to the individual plant.</p>
518	For identification and characterization of the direct effects of the pest on each potential host in the PRA area, or those effects that are host-specific, the following are examples of factors that may be considered:	C	<p>(283) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:22 PM] Red – the paragraph is from section2.3.1.1 of ISPM11</p>
530	For each of the potential hosts, the total area of the crop and area potentially endangered should be estimated in relation to the elements given above.	C	<p>(284) Imported Comment (30 Jun 2023 3:20 PM)</p>

		[Originally made by M.Sai on 18 May 2023 11:22 PM] Red – the paragraph is from section2.3.1.1 of ISPM11
532	4.1.3 Indirect pest effects	C <i>Category : SUBSTANTIVE (1500) European Union (27 Sep 2023 5:23 PM)</i> It would help if "indirect pest" and "indirect pest effects" could be explained (see our comment on paragraph 517).
532	4.1.3 Indirect pest effects	C <i>Category : SUBSTANTIVE (1241) EPPO (26 Sep 2023 10:55 AM)</i> It would help if "indirect pest" and "indirect pest effects" could be explained
532	4.1.3 1.2 Indirect pest effects	P <i>Category : EDITORIAL (1080) Canada (25 Sep 2023 4:30 PM)</i> Changing number of heading. Subsequent numbering of headings that follow should also be modified
533	For identification and characterization of the indirect effects of the pest in the PRA area, or those effects that are not host-specific, the following are examples of factors that may be considered:	C (285) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:23 PM] Red – the paragraph is from section2.3.1.2 of ISPM11
542	social and other effects (e.g. on tourism).	C <i>Category : TECHNICAL (1501) European Union (27 Sep 2023 5:26 PM)</i> Effects on tourism can be financial (i.e. economic) so better to provide an alternative example as a social effect. Suggest rephrase as marked: "social effects (e.g. on tourism recreational activities)".
542	social and other effects (e.g. on tourism).	C <i>Category : TECHNICAL (1242) EPPO (26 Sep 2023 10:55 AM)</i> Effects on tourism can be financial (i.e. economic) so better to provide an alternative example as a social effect. Suggest rephrase : "social effects (e.g. on tourism recreational activities)"
543	When considering effects on domestic and export markets, the potential consequences for market access that may result if the pest becomes established should be estimated. This involves considering the extent of any phytosanitary regulations imposed (or likely to be imposed) by <u>countries importing countries from the PRA area</u> .	P <i>Category : EDITORIAL (1502) European Union (27 Sep 2023 5:38 PM)</i> Improved drafting.

543	<p>When considering effects on domestic and export markets, the potential consequences for market access that may result if the pest becomes established should be estimated. This involves considering the extent of any phytosanitary regulations imposed (or likely to be imposed) by <u>countries</u> importing <u>countries</u> from the PRA area.</p>	P	<p>Category : EDITORIAL (1243) EPPO (26 Sep 2023 10:55 AM) Improved drafting</p>
543	<p>When considering effects on domestic and export markets, the potential consequences for market access that may result if the pest becomes established should be estimated. This involves considering the extent of any phytosanitary regulations imposed (or likely to be imposed) by importing countries.</p>	C	<p>(286) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:25 PM] Red – the paragraph is from ISPM11 (from bracket of 1st indent of section 2.3.1.2)</p>
545	<p>Effects on human and animal health (e.g. toxicity, allergenicity), water tables, tourism and so on <u>could also</u> be considered, as appropriate, by other agencies or authorities.</p>	C	<p>Category : EDITORIAL (1503) European Union (27 Sep 2023 5:39 PM) Or better: "may need to be considered"? and also 'So on' is not appropriate for a Standard.</p>
545	<p>Effects on human and animal health (e.g. toxicity, allergenicity), water tables, tourism and so on could also be considered, as appropriate, by other agencies or authorities.</p>	C	<p>Category : EDITORIAL (1244) EPPO (26 Sep 2023 10:55 AM) Or better: "may need to be considered"? and also 'So on' is not appropriate for a Standard.</p>
545	<p>Effects on human and animal health (e.g. toxicity, allergenicity), water tables, tourism and so on could also be considered, as appropriate, by other agencies or authorities.</p>	C	<p>(287) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:27 PM] Red – the paragraph is from section 2.3.1.2 of ISPM11</p>
548	<p>Some of the direct and indirect effects of the introduction of a pest determined in section 4.1.2 and section 4.1.3 will be of an economic nature, or affect some type of value, but not have an existing market which can be easily identified. As a result, the effects may not be adequately measured in terms of prices in established product or service markets. Examples include, in particular, environmental effects (such as ecosystem stability, biodiversity) and social effects (such as mental well-being or spiritual, religious and cultural connections) arising from a pest introduction. These impacts may be approximated with an appropriate non-market valuation method. More details on environmental effects are <u>given below</u> in section 4.2.4.</p>	P	<p>Category : EDITORIAL (1668) Japan (28 Sep 2023 4:04 AM)</p>
548	<p>Some of the direct and indirect effects of the introduction of a pest determined in section 4.1.2 and section 4.1.3 will be of an economic nature, or affect some type</p>	C	<p>Category : SUBSTANTIVE (1505) European Union (27 Sep 2023 5:42 PM)</p>

	of value, but not have an existing market which can be easily identified. As a result, the effects may not be adequately measured in terms of prices in established product or service markets. Examples include, in particular, environmental effects (such as ecosystem stability, biodiversity) and social effects (such as mental well-being or spiritual, religious and cultural connections) arising from a pest introduction. These impacts may be approximated with an appropriate non-market valuation method. More details on environmental effects are given below.		Add ecosystem services?
548	Some of the direct and indirect effects of the introduction of a pest determined in section 4.1.2 and section 4.1.3 will be of an economic nature, or affect some type of value, but not have an existing market which can be easily identified. As a result, the effects may not be adequately measured in terms of prices in established product or service markets. Examples include, in particular, environmental effects (such as ecosystem stability, biodiversity) and social effects (such as mental well-being or spiritual, religious and cultural connections) arising from a pest introduction. These impacts may be approximated with an appropriate non-market valuation method. More details on environmental effects are given below.	C	<p>Category : EDITORIAL (1504) European Union (27 Sep 2023 5:41 PM) 'are given below' comes from the old text, now split in 4.1.4 and 4.2.4, hence is it better to remove or to make reference more specifically to 4.2.4?</p>
548	Some of the direct and indirect effects of the introduction of a pest determined in section 4.1.2 and section 4.1.3 will be of an economic nature, or affect some type of value, but not have an existing market which can be easily identified. As a result, the effects may not be adequately measured in terms of prices in established product or service markets. Examples include, in particular, environmental effects (such as ecosystem stability, biodiversity) and social effects (such as mental well-being or spiritual, religious and cultural connections) arising from a pest introduction. These impacts may be approximated with an appropriate non-market valuation method. More details on environmental effects are given below.	C	<p>Category : EDITORIAL (1246) EPPO (26 Sep 2023 10:55 AM) are given below': comes from the old text, now split in 4.1.4 and 4.2.4, hence it is better to remove or to make reference more specific to 4.2.4?</p>
548	Some of the direct and indirect effects of the introduction of a pest determined in section 4.1.2 and section 4.1.3 will be of an economic nature, or affect some type of value, but not have an existing market which can be easily identified. As a result, the effects may not be adequately measured in terms of prices in established product or service markets. Examples include, in particular, environmental effects (such as ecosystem stability, biodiversity) and social effects (such as mental well-being or spiritual, religious and cultural connections) arising from a pest introduction. These impacts may be approximated with an appropriate non-market valuation method. More details on environmental effects are given below.	C	<p>Category : SUBSTANTIVE (1245) EPPO (26 Sep 2023 10:55 AM) Add ecosystem services?</p>

548	<p>Some of the direct and indirect effects of the introduction of a pest determined in section 4.1.2 and section 4.1.3 will be of an economic nature, or affect some type of value, but not have an existing market which can be easily identified. As a result, the effects may not be adequately measured in terms of prices in established product or service markets. Examples include, in particular, environmental effects (such as ecosystem stability, biodiversity) and social effects (such as mental well-being or spiritual, religious and cultural connections) arising from a pest introduction. These impacts may be approximated with an appropriate non-market valuation method. More details on environmental effects are given below.</p>	C	<p>(288) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:28 PM] Red – the paragraph is from section2.3.2.4 of ISPM11</p>
550	<p>If quantitative measurement of such consequences is not feasible, qualitative information about the consequences may be provided. An explanation of how this information has been incorporated into decisions should also be provided.</p>	C	<p>(289) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:28 PM] Red – the paragraph is from section2.3.2.4 of ISPM11</p>
554	<p>Estimations made in the previous section could relate to a hypothetical situation where the pest is supposed to have been introduced and to be fully expressing its potential economic consequences (per year) in the PRA area. In practice, however, economic consequences are expressed with time and may concern one year, several years or an indeterminate period. Various scenarios should be considered. The total economic consequences over more than one year may be expressed as net present value of annual economic consequences, and an appropriate discount rate selected to calculate net present value.</p>	C	<p>Category : SUBSTANTIVE (1507) European Union (27 Sep 2023 5:47 PM) If specifying a time frame is being included (see comments for paragraphs 395 and 476), suggest deleting.</p>
554	<p>Estimations made in the previous section could relate to a hypothetical situation where the pest is supposed to have been introduced and to be fully expressing its potential economic consequences (per year) in the PRA area. In practice, however, economic consequences are<ins>may be</ins> expressed with time and may concern one year, several years or an indeterminate period<ins>several years</ins>. Various scenarios should be considered. The total economic consequences over more than one year may be expressed as net present value of annual economic consequences, and an appropriate discount rate selected to calculate net present value.</p>	P	<p>Category : TECHNICAL (1506) European Union (27 Sep 2023 5:46 PM) Proposed amendments if our other comment on this paragraph isn't taken on board.</p>
554	<p>Estimations made in the previous section could relate to a hypothetical situation where the pest is supposed to have been introduced and to be fully expressing its potential economic consequences (per year) in the PRA area. In practice, however, economic consequences are<ins>may be</ins> expressed with time and may concern one year, several years or an indeterminate period<ins>several years</ins>. Various scenarios should be considered. The total economic consequences over more than one year</p>	P	<p>Category : TECHNICAL (1248) EPPO (26 Sep 2023 10:55 AM) Proposed amendments if deletion of this paragraph (see other comment on this paragraph) is not taken on board.</p>

	<p>may be expressed as net present value of annual economic consequences, and an appropriate discount rate selected to calculate net present value.</p>		
554	<p>Estimations made in the previous section could relate to a hypothetical situation where the pest is supposed to have been introduced and to be fully expressing its potential economic consequences (per year) in the PRA area. In practice, however, economic consequences are expressed with time and may concern one year, several years or an indeterminate period. Various scenarios should be considered. The total economic consequences over more than one year may be expressed as net present value of annual economic consequences, and an appropriate discount rate selected to calculate net present value.</p>	C	<p><i>Category : SUBSTANTIVE</i> (1247) EPPO (26 Sep 2023 10:55 AM) If specifying a time frame is being included (see comments for paragraphs 395 and 476) suggest deleting.</p>
554	<p>Estimations made in the previous section could relate to a hypothetical situation where the pest is supposed to have been introduced and to be fully expressing its potential economic consequences (per year) in the PRA area. In practice, however, economic consequences are expressed with time and may concern one year, several years or an indeterminate period. Various scenarios should be considered. The total economic consequences over more than one year may be expressed as <u>a</u> net present value of annual economic consequences, and an appropriate discount rate selected to calculate net present value.</p>	P	<p><i>Category : EDITORIAL</i> (597) Ghana (31 Aug 2023 12:00 AM)</p>
554	<p>Estimations made in the previous section could relate to a hypothetical situation where the pest is supposed to have been introduced and to be fully expressing its potential economic consequences (per year) in the PRA area. In practice, however, economic consequences are expressed with time and may concern one year, several years or an indeterminate period. Various scenarios should be considered. The total economic consequences over more than one year may be expressed as net present value of annual economic consequences, and an appropriate discount rate selected to calculate net present value.</p>	C	<p>(290) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.3.2.1 of ISPM11</p>
556	<p>Other scenarios could concern whether the pest is present at one, few or many points in the PRA area and the expression of potential economic consequences will depend on the rate and manner of spread in the PRA area. The rate of spread may be envisaged to be slow or rapid; in some cases, it may be supposed that spread can be prevented. Appropriate analysis may be used to estimate potential economic consequences over the period of time when a pest is spreading in the PRA area. In addition, many of the factors or effects considered above could be expected to change over time, with the consequent effects of potential economic consequences.</p>	C	<p>(291) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.3.2.1 of ISPM11</p>

	Expert judgement and estimations may be used if appropriate.		
559	<p>As determined above, most of the direct effects of a pest, and some of the indirect effects, will be of a commercial nature or have consequences for an identified market. These effects, which may be positive or negative, should be identified and quantified where possible. The following may usefully be considered:</p>	C	<p>(292) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.2.2 of ISPM11</p>
564	<p>There are analytical techniques that may be used, in consultation with experts in economics, to analyse in more detail the potential economic effects of a quarantine pest. The analysis should incorporate all of the effects that have been identified. The following are examples of such techniques:</p>	P	<p><i>Category : SUBSTANTIVE</i> (1664) China (28 Sep 2023 3:21 AM) The objects that need to be assessed for economic loss include not only quarantine pests, but also other possible alien plant pests, and some important alien species are not included in the phytosanitary list.</p>
564	<p>There are analytical techniques that may be used, in consultation with experts in economics, to analyse in more detail the potential economic effects of a quarantine pest. The analysis should incorporate all of the effects that have been identified. The following are examples of such techniques:</p>	P	<p><i>Category : SUBSTANTIVE</i> (1110) APPPC (26 Sep 2023 10:36 AM) The objects that need to be assessed for economic loss include not only quarantine pests, but also other possible alien plant pests, and some important alien species are not included in the phytosanitary list.</p>
564	<p>There are analytical techniques that may be used, in consultation with experts in economics, to analyse in more detail the potential economic effects of a quarantine pest. The analysis should incorporate all of the effects that have been identified. The following are examples of such techniques:</p>	C	<p>(293) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.3.2.3 of ISPM11</p>
569	<p>The use of analytical techniques is often limited by lack of data, by uncertainties in the data, and by the fact that for certain effects only qualitative information can be provided.</p>	C	<p>(294) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.3.2.3 of ISPM11</p>
572	<p>Application of this standard to environmental consequences requires clear categorization of environmental values and the methodologies used to assess them. The environment may be valued using various methodologies, but these methodologies are best used in consultation with experts in environmental economics. Methodologies may include consideration of “use” and “non-use” values. “Use” values arise from consumption of an element of the environment, such as accessing clean water or fishing in a lake, and also those that are non-consumptive, such as use of forests for leisure activities. “Non-use” values may be subdivided into:</p>	P	<p><i>Category : TECHNICAL</i> (1508) European Union (27 Sep 2023 5:49 PM) Are we referring to experts in environmental economics? Better to keep it more general.</p>
572	<p>Application of this standard to environmental consequences requires clear categorization of environmental values and the methodologies used to assess them. The environment may be valued using various methodologies, but these</p>	P	<p><i>Category : TECHNICAL</i> (1249) EPPO (26 Sep 2023 10:55 AM) Are we referring to experts in environmental economics? Better to keep it more general.</p>

	methodologies are best used in consultation with experts in economics. Methodologies may include consideration of “use” and “non-use” values. “Use” values arise from consumption of an element of the environment, such as accessing clean water or fishing in a lake, and also those that are non-consumptive, such as use of forests for leisure activities. “Non-use” values may be subdivided into:		
572	Application of this standard to environmental consequences requires clear categorization of environmental values and the methodologies used to assess them. The environment may be valued using various methodologies, but these methodologies are best used in consultation with experts in economics. Methodologies may include consideration of “use” and “non-use” values. “Use” values arise from consumption of an element of the environment, such as accessing clean water or fishing in a lake, and also those that are non-consumptive, such as use of forests for leisure activities. “Non-use” values may be subdivided into:	C	(295) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:31 PM] Red – the paragraph is from section2.3.2.4 of ISPM11
577	Whether the element of the environment is being assessed in terms of use or non-use values, methodologies exist for their valuation, such as market-based approaches, surrogate markets, simulated markets, and benefit transfer. Each has advantages, disadvantages and situations where it is particularly useful.	C	Category : SUBSTANTIVE (564) New Zealand (10 Aug 2023 6:51 AM) General comment: this is implementation issue and should be moved out of the standard to become implementation guidance. Guidance material should be developed, e.g. monetary valuation of environmental impacts can be controversial.
577	Whether the element of the environment is being assessed in terms of use or non-use values, methodologies exist for their valuation, such as market-based approaches, surrogate markets, simulated markets, and benefit transfer. Each has advantages, disadvantages and situations where it is particularly useful.	C	(296) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:33 PM] Red – the paragraph is from section2.3.2.4 of ISPM11
579	The assessment of consequences may be either quantitative or qualitative; in many cases, qualitative data are sufficient. A quantitative method may not exist to address a situation (e.g. catastrophic effects on a keystone species), or a quantitative analysis may not be possible (no methods available). Useful analyses can be based on non-monetary valuations (number of species affected, water quality), or expert judgement, if the analyses follow documented, consistent and transparent procedures.	C	Category : SUBSTANTIVE (1509) European Union (27 Sep 2023 5:51 PM) Text in this paragraph applies to both 4.2.3 and 4.2.4. Consider moving para 579 down into 4.3 to be the first paragraph of section 4.3 Conclusion of the assessment of consequences.
579	The assessment of consequences may be either quantitative or qualitative; in many cases, qualitative data are sufficient. A quantitative method may not exist to address a situation (e.g. catastrophic effects on a keystone species), or a quantitative analysis may not be possible (no methods available). Useful analyses	C	Category : SUBSTANTIVE (1250) EPPO (26 Sep 2023 10:55 AM) Text in this paragraph applies to both 4.2.3 and 4.2.4. Consider moving para 579 down

	can be based on non-monetary valuations (number of species affected, water quality), or expert judgement, if the analyses follow documented, consistent and transparent procedures.		into 4.3 to be the first paragraph of Conclusion of the assessment of consequences.
579	The assessment of consequences may be either quantitative or qualitative; in many cases, qualitative data are sufficient. A quantitative method may not exist to address a situation (e.g. catastrophic effects on a keystone species), or a quantitative analysis may not be possible (no methods available). Useful analyses can be based on non-monetary valuations (number of species affected, water quality), or expert judgement, if the analyses follow documented, consistent and transparent procedures.	C	(297) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:33 PM] Red – the paragraph is from section2.3.2.4 of ISPM11
581	4.3 Conclusion of the assessment of economic consequences	P	Category : TECHNICAL (816) COSAVE (12 Sep 2023 8:02 PM) See general comment
581	4.3 Conclusion of the assessment of economic consequences	P	Category : TECHNICAL (668) Uruguay (7 Sep 2023 5:35 PM) See general comment
582	Wherever appropriate, the output of the assessment of <u>economic</u> consequences described in this step should be in terms of a monetary value. The <u>economic</u> consequences may also be expressed qualitatively or using quantitative measures without monetary terms. Sources of information, assumptions, uncertainty and methods of analysis should be clearly specified.	P	Category : TECHNICAL (817) COSAVE (12 Sep 2023 8:04 PM) See general comment
582	Wherever appropriate, the output of the assessment of <u>economic</u> consequences described in this step should be in terms of a monetary value. The <u>economic</u> consequences may also be expressed qualitatively or using quantitative measures without monetary terms. Sources of information, assumptions, uncertainty and methods of analysis should be clearly specified.	P	Category : TECHNICAL (669) Uruguay (7 Sep 2023 5:36 PM) See general comment
582	Wherever appropriate, the output of the assessment of consequences described in this step should be in terms of a monetary value. The consequences may also be expressed qualitatively or using quantitative measures without monetary terms. Sources of information, assumptions, uncertainty and methods of analysis should be clearly specified.	C	(298) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:34 PM] Red – the paragraph is from section2.3.3 of ISPM11 Changed “economic consequences” to “consequences”
586	The part of the PRA area where presence of the pest will result in economically important loss should be identified.	C	(299) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 7:49 PM] Red – the paragraph is from section2.3.3.1 of ISPM11

			Deleted "This is needed to define the endangered area." from "2.3.3.1 Endangered area" of the present ISPM11
589	5. Degree of uncertainty	P	<p>Category : SUBSTANTIVE (1510) European Union (27 Sep 2023 5:52 PM)</p> <p>This section is not needed, as it is already covered by the main body of the standard. This is a generic point applicable to all stages of a PRA.</p>
589	5. Degree of uncertainty	P	<p>Category : SUBSTANTIVE (1251) EPPO (26 Sep 2023 10:55 AM)</p> <p>This section is not needed, as it is already covered by the main body of the standard. This is a generic point applicable to all stages of a PRA.</p>
590	Estimation of the probability of introduction of a pest and of its consequences involves many uncertainties. In particular, this estimation is an extrapolation from the situation where the pest is present to the hypothetical situation in the PRA area. The areas of uncertainty and the degree of uncertainty in the assessment should be documented, as should any use of expert judgement. This is important for the purposes of transparency and may also be useful for the identification and prioritization of research needs.	P	<p>Category : SUBSTANTIVE (1511) European Union (27 Sep 2023 5:53 PM)</p> <p>This section is not needed, as it is already covered by the main body of the standard. This is a generic point applicable to all stages of a PRA.</p>
590	Estimation of the probability of introduction of a pest and of its consequences involves many uncertainties. In particular, this estimation is an extrapolation from the situation where the pest is present to the hypothetical situation in the PRA area. The areas of uncertainty and the degree of uncertainty in the assessment should be documented, as should any use of expert judgement. This is important for the purposes of transparency and may also be useful for the identification and prioritization of research needs.	P	<p>Category : SUBSTANTIVE (1252) EPPO (26 Sep 2023 10:55 AM)</p> <p>This section is not needed, as it is already covered by the main body of the standard. This is a generic point applicable to all stages of a PRA.</p>
590	Estimation of the probability of introduction of a pest and of its <u>potential economic</u> consequences involves many uncertainties. In particular, this estimation is an extrapolation from the situation where the pest is present to the hypothetical situation in the PRA area. The areas of uncertainty and the degree of uncertainty in the assessment should be documented, as should any use of expert judgement. This is important for the purposes of transparency and may also be useful for the identification and prioritization of research needs.	P	<p>Category : TECHNICAL (818) COSAVE (12 Sep 2023 8:05 PM)</p> <p>See general comment. "potential" added for consistency</p>
590	Estimation of the probability of introduction of a pest and of its <u>potential economic</u>	P	Category : TECHNICAL

	<p>consequences involves many uncertainties. In particular, this estimation is an extrapolation from the situation where the pest is present to the hypothetical situation in the PRA area. The areas of uncertainty and the degree of uncertainty in the assessment should be documented, as should any use of expert judgement. This is important for the purposes of transparency and may also be useful for the identification and prioritization of research needs.</p>		<p>(670) Uruguay (7 Sep 2023 5:38 PM) See general comment. "potential" added for consistency</p>
590	<p>Estimation of the probability of introduction of a pest and of its consequences involves many uncertainties. In particular, this estimation is an extrapolation from the situation where the pest is present to the hypothetical situation in the PRA area. The areas of uncertainty and the degree of uncertainty in the assessment should be documented, as should any use of expert judgement. This is important for the purposes of transparency and may also be useful for the identification and prioritization of research needs.</p>	C	<p>(300) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 7:46 PM] Red – the paragraph is from section2.4 of ISPM11 Changed "economic consequences" to "consequences"</p>
594	<p>As a result of the pest risk assessment, all or some of the categorized pests may be considered appropriate for pest risk management. For each pest, all or part of the PRA area may be identified as an endangered area. A quantitative or qualitative estimate of the probability of introduction and spread of a pest or pests, and a corresponding quantitative or qualitative estimate of <u>economic</u> consequences, have been obtained and documented or an overall rating could have been assigned. These estimates, with associated uncertainties, are used in the pest risk management stage of the PRA.</p>	P	<p><i>Category : TECHNICAL</i> (819) COSAVE (12 Sep 2023 8:06 PM) See general comment.</p>
594	<p>As a result of the pest risk assessment, all or some of the categorized pests may be considered appropriate for pest risk management. For each pest, all or part of the PRA area may be identified as an endangered area. A quantitative or qualitative estimate of the probability of introduction and spread of a pest or pests, and a corresponding quantitative or qualitative estimate of <u>economic</u> consequences, have been obtained and documented or an overall rating could have been assigned. These estimates, with associated uncertainties, are used in the pest risk management stage of the PRA.</p>	P	<p><i>Category : TECHNICAL</i> (671) Uruguay (7 Sep 2023 5:45 PM) See general comment</p>
594	<p>As a result of the pest risk assessment, all or some of the categorized pests may be considered appropriate for pest risk management. For each pest, all or part of the PRA area may be identified as an endangered area. A quantitative or qualitative estimate of the probability of introduction and spread of a pest or pests, and a corresponding quantitative or qualitative estimate of consequences, have been</p>	C	<p>(301) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 7:38 PM] Red – the paragraph is from section2.5 of ISPM11 Changed "economic consequences (including environmental consequences)" to</p>

	<p>obtained and documented or an overall rating could have been assigned. These estimates, with associated uncertainties, are used in the pest risk management stage of the PRA.</p>		"consequences"
603	ANNEX 3: Pest risk management (PRA Stage 3)	C	<p>(302) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 19 May 2023 12:08 AM] Black – Most texts in Annex-3 are from ISPM on PRA or revised texts from ISPM11. Red – some paragraphs are from ISPM11 see comments below</p>
607	Stage 3 involves the identification and evaluation of pest risk management options, and their subsequent selection to be implemented as phytosanitary measures that alone, or in combination, reduce the risk of <u>introduction and introduction</u> , spread <u>and negative consequences</u> of a pest to an acceptable level.	P	<p><i>Category : SUBSTANTIVE</i> (1512) European Union (27 Sep 2023 5:54 PM) This should also cover reducing the consequences of a pest e.g., "reduce the risk of introduction, spread and negative consequences of a pest to an acceptable level".</p>
607	Stage 3 involves the identification and evaluation of pest risk management options, and their subsequent selection to be implemented as phytosanitary measures that alone, or in combination, reduce the risk of <u>introduction and introduction</u> , spread <u>and negative consequences</u> of a pest to an acceptable level.	P	<p><i>Category : SUBSTANTIVE</i> (1253) EPPO (26 Sep 2023 10:55 AM) This should also cover reducing the consequences of a pest e.g., "reduce the risk of introduction, spread and negative consequences of a pest to an acceptable level".</p>
607	Stage 3 involves the identification and evaluation of pest risk management options, and their subsequent selection to be implemented as phytosanitary measures <u>that as stand</u> alone, or in combination, <u>to</u> reduce the risk of introduction and spread of a pest to an acceptable level.	P	<p><i>Category : SUBSTANTIVE</i> (1057) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</p>
607	Stage 3 involves the identification and evaluation of pest risk management options, and their subsequent selection to be implemented as phytosanitary measures that alone, or in combination, reduce the risk of introduction and spread of a <u>quarantine</u> pest to an acceptable level.	P	<p><i>Category : SUBSTANTIVE</i> (915) PPPO (17 Sep 2023 1:13 PM) For clarity, and also because by this stage countries would already have a list of quarantine/non-quarantine pests. PPPO is also okay to seek further clarification if 'quarantine' should be included.</p>
607	Stage 3 involves the identification and evaluation of pest risk management options, and their subsequent selection to be implemented as phytosanitary measures that alone, or in combination, reduce the <u>risk of introduction and spread of a pest risk</u> to an acceptable level.	P	<p><i>Category : TECHNICAL</i> (820) COSAVE (12 Sep 2023 8:07 PM) To avoid repetition and for consistency throughout the text</p>

607	Stage 3 involves the identification and evaluation of pest risk management options, and their subsequent selection to be implemented as phytosanitary measures that alone, or in combination, reduce the risk of introduction and spread of a pest risk to an acceptable level.	P	Category : TECHNICAL (672) Uruguay (7 Sep 2023 5:47 PM) To avoid repetition and for consistency throughout the text
608	The conclusions from pest risk assessment are used to decide whether a pest risk is acceptable or not. Since zero risk is not a reasonable option, pest risk should be managed following the guiding principle of managed risk (see ISPM 1) to achieve the appropriate level of protection that can be justified and is feasible within the limits of available options and resources. ⁵ The uncertainty noted in the pest risk assessments-assessment should be taken into account in the selection of a pest risk management option.	P	Category : EDITORIAL (1513) European Union (27 Sep 2023 5:56 PM) Better English.
608	The conclusions from pest risk assessment are used to decide whether a pest risk is acceptable or not. Since zero risk is not a reasonable option, pest risk should be managed following the guiding principle of managed risk (see ISPM 1) to achieve the appropriate level of protection that can be justified and is feasible within the limits of available options and resources. ⁵ The uncertainty noted in the pest risk assessments-assessment should be taken into account in the selection of a pest risk management option.	P	Category : EDITORIAL (1254) EPPO (26 Sep 2023 10:55 AM) Better English.
608	The conclusions from pest risk assessment are used to decide whether a pest risk is acceptable or not, whether pest risk management is required and the strength of measures to be used . Since zero risk is not a reasonable option, pest risk should be managed following the guiding principle of managed risk (see ISPM 1) to achieve the appropriate level of protection that can be justified and is feasible within the limits of available options and resources. ⁵ Pest risk management (in the analytical sense) is the process of identifying ways to react to a perceived pest risk, evaluating the efficacy of these actions, and identifying the most appropriate options. The uncertainty noted in the pest risk assessments should be taken into account in the selection of a pest risk management option.	P	Category : TECHNICAL (821) COSAVE (12 Sep 2023 8:09 PM) Current wording in ISPM 11 is more clear, added text is from current ISPM 11
608	The conclusions from pest risk assessment are used to decide whether a pest risk is acceptable or not, whether pest risk management is required and the strength of measures to be used . Since zero risk is not a reasonable option, pest risk should be managed following the guiding principle of managed risk (see ISPM 1) to achieve the appropriate level of protection that can be justified and is feasible within the limits of available options and resources. ⁵ Pest risk management (in the analytical	P	Category : TECHNICAL (673) Uruguay (7 Sep 2023 7:30 PM) Current wording in ISPM 11 is more clear, added text is from current ISPM 11

	<p><u>sense) is the process of identifying ways to react to a perceived pest risk, evaluating the efficacy of these actions, and identifying the most appropriate options.</u> The uncertainty noted in the pest risk assessments should be taken into account in the selection of a pest risk management option.</p>		
610	<p><u>Even in such cases, however, contracting parties may decide to maintain some monitoring or audit regarding the pest risk to detect future changes in that risk.</u> Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, such as in the case of natural spread. Even in such cases, however, contracting parties may decide to maintain some monitoring <u>or audit</u> regarding the pest risk to detect future changes in that risk.</p>	P	<p><i>Category : SUBSTANTIVE (1670) New Zealand (28 Sep 2023 9:09 AM)</i></p> <p>to delete this sentence. Not so clear cut for island nations where natural spread is possible, but not a given.</p>
610	<p>Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, such as in the case of natural spread. Even in such cases, however, contracting parties may decide to maintain some monitoring <u>or audit</u> regarding the pest risk to detect future changes in that risk.</p>	P	<p><i>Category : SUBSTANTIVE (1519) European Union (27 Sep 2023 6:02 PM)</i></p> <p>We propose deleting audit as it does not seem to be the right word here.</p>
610	<p>Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, such as in the case of natural spread. Even in such cases, <u>however,</u> contracting parties may decide to maintain some monitoring or audit regarding the pest risk to detect future changes in that risk.</p>	P	<p><i>Category : EDITORIAL (1517) European Union (27 Sep 2023 6:00 PM)</i></p> <p>Unnecessary word.</p>
610	<p>Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, <u>such as in the case of natural spread.</u> Even in such cases, however, contracting parties may decide to maintain some monitoring or audit regarding the pest risk to detect future changes in that risk.</p>	P	<p><i>Category : TECHNICAL (1514) European Union (27 Sep 2023 5:57 PM)</i></p> <p>Natural spread can be very slow but is still natural spread. In such case, phytosanitary measures are justified. Here the reference should be to pests with high spread capacity. This should be explained better.</p> <p>Even if there is natural spread, there is still the possibility of implementing containment actions. Phytosanitary measures can be used in these circumstances. Either the example of natural spread should be removed or qualified that this is only true in some cases.</p>
610	<p>Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, <u>such as in the case of natural spread.</u> Even in such <u>cases,</u> <u>however,</u> <u>cases</u> contracting parties may decide to maintain some monitoring <u>or audit</u> regarding the pest risk to detect future changes in that risk.</p>	P	<p><i>Category : TECHNICAL (1255) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Natural spread can be very slow but is still natural spread. In such case, phytosanitary measures are justified. Here the reference</p>

			should be to pests with high spread capacity. This should be explained better. Even if there is natural spread, there is still the possibility of implementing containment actions. Phytosanitary measures can be used in these circumstances. Either the example of natural spread should be removed or qualified that this is only true in some cases. 'however' is not a necessary word. We proposed deleting audit as it does not seem to be the right word here.
610	Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, such as in the case of natural spread. Even in such cases, however, contracting parties may decide to maintain some monitoring <u>or audit and evaluation</u> regarding the pest risk to detect future changes in that risk.	P	<i>Category : SUBSTANTIVE (1084) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM)</i> Audit in the phytosanitary sense carries a different connotation
610	Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, such as in the case of natural spread. Even in such cases, however, contracting parties may decide to maintain some monitoring or <u>audit</u> regarding the pest risk to detect future changes in that risk.	P	<i>Category : TECHNICAL (822) COSAVE (12 Sep 2023 8:12 PM)</i> Audit is not appropriate in this context
610	Phytosanitary measures are not justified if the pest risk is deemed to be acceptable or if they are not feasible, such as in the case of natural spread. Even in such cases, however, contracting parties may decide to maintain some monitoring <u>or audit</u> regarding the pest risk to detect future changes in that risk.	P	<i>Category : TECHNICAL (674) Uruguay (7 Sep 2023 7:33 PM)</i> Audit is not appropriate in this context
612	In implementing the principle of managed risk, it is recognized that contracting parties have the sovereign right to decide the level of pest risk they deem to be acceptable and they can use phytosanitary measures to <u>determine</u> provide an appropriate level of protection. Equally, contracting parties should follow the principle of minimal impact when applying phytosanitary measures (see IPPC Article VII.2(g)).	P	<i>Category : TECHNICAL (1094) Eswatini (26 Sep 2023 9:02 AM)</i>
612	In implementing the principle of managed risk, <u>it is recognized that</u> contracting parties have the sovereign right to decide the level of pest risk they deem to be acceptable and they can use phytosanitary measures to provide an appropriate level of protection. Equally, contracting parties should follow the principle of minimal	P	<i>Category : EDITORIAL (823) COSAVE (12 Sep 2023 8:13 PM)</i> Not necessary

	impact when applying phytosanitary measures (see IPPC Article VII.2(g)).		
612	In implementing the principle of managed risk, it is recognized that contracting parties have the sovereign right to decide the level of pest risk they deem to be acceptable and they can use phytosanitary measures to provide an appropriate level of protection. Equally, contracting parties should follow the principle of minimal impact when applying phytosanitary measures (see IPPC Article VII.2(g)).	P	<i>Category : EDITORIAL (675) Uruguay (7 Sep 2023 7:34 PM)</i> Not necessary
613	The level of pest risk deemed to be acceptable may be expressed in various ways. It may, for example:	C	<i>Category : SUBSTANTIVE (1671) New Zealand (28 Sep 2023 9:12 AM)</i> Potential implementation issue, guidance material will be helpful including case studies, e.g. Would be good to expand on what goes into estimated economic losses and risk tolerance scales
617	<u>Specific guidance on pest risk management for plants as pests is provided in Annex 6.</u>	P	<i>Category : SUBSTANTIVE (1520) European Union (27 Sep 2023 6:03 PM)</i> Not necessary to say it here and, also, pest risk management is available in annex 5 for LMOs.
617	<u>Specific guidance on pest risk management for plants as pests is provided in Annex 6.</u>	P	<i>Category : SUBSTANTIVE (1256) EPPO (26 Sep 2023 10:55 AM)</i> Not necessary to say it here and also, PRM is available in annex 5 for LMOs
619	A variety of sources of information may be used to support the identification and subsequent selection of pest risk management options, including pest risk assessments, historical records and <u>history of use</u> .	C	<i>Category : EDITORIAL (1689) Australia (29 Sep 2023 5:58 AM)</i> It would be appreciated I s the Steward could clarify what is meant by 'history of use' as its not quite clear what it is referring to.
619	A variety of sources of information may be used to support the identification and subsequent selection of pest risk management options, including pest risk assessments, historical records and history of <u>use of the phytosanitary measure in trade</u> .	P	<i>Category : SUBSTANTIVE (916) PPPO (17 Sep 2023 1:13 PM)</i> This inclusion makes it clear what 'history of use' refers to.
619	A variety of sources of information may be used to support the identification and subsequent selection of pest risk management options, including <u>pest risk assessments</u> , historical records and history of use.	C	<i>Category : TECHNICAL (623) United States of America (7 Sep 2023 2:09 PM)</i> Does this mean the prior PRAs conducted by the same NPPO for the same PRA area? Generally, any risk assessments conducted for the same pest but for a different purpose

			should not be used as the primary evidence.
619	A variety of sources of information may be used to support the identification and subsequent selection of pest risk management options, including pest risk assessments, historical records and history of use.	C	<p><i>Category : SUBSTANTIVE (614) Congo, DR (5 Sep 2023 10:41 AM)</i> available international standards of IPPC and phytosanitary protocols agreed with other contracting parties</p>
619	A variety of sources of information may be used to support the identification and subsequent selection of pest risk management options, including pest risk assessments, historical records and history of use, <u>available international standards of IPPC and phytosanitary protocols agreed with other contracting parties</u> .	P	<p><i>Category : SUBSTANTIVE (602) Morocco (4 Sep 2023 11:11 AM)</i></p>
620	Pest risk assessments identify quarantine pests that may require phytosanitary measures on the assessed pathway. For the formulation of pest risk management options, the pest risk assessment <u>provides may provide</u> relevant information, such as:	P	<p><i>Category : TECHNICAL (1524) European Union (27 Sep 2023 6:11 PM)</i> See comment in para 626.</p>
620	Pest risk assessments identify quarantine pests that may require phytosanitary measures on the assessed pathway. For the formulation of pest risk management options, the pest risk assessment <u>provides may provide</u> relevant information, such as:	P	<p><i>Category : TECHNICAL (1257) EPPO (26 Sep 2023 10:55 AM)</i> See comment in para 626.</p>
620	Pest risk assessments identify quarantine pests that may require phytosanitary measures on the assessed pathway. For the formulation of pest risk management options, the <u>pest risk assessment provides relevant following</u> information, <u>such as</u> <u>should be considered</u> :	P	<p><i>Category : TECHNICAL (824) COSAVE (12 Sep 2023 8:15 PM)</i> Not all information listed is provided by pest risk assessment, but it is relevant information for the formulation of pest risk management options</p>
620	Pest risk assessments identify quarantine pests that may require phytosanitary measures on the assessed pathway. For the formulation of pest risk management <u>options, options</u> the <u>pest risk assessment provides relevant following</u> information, <u>such as</u> <u>should be considered</u> :	P	<p><i>Category : TECHNICAL (676) Uruguay (7 Sep 2023 7:43 PM)</i> Not all information listed is provided by pest risk assessment, but it is relevant information for the formulation of pest risk management options</p>
623	<u>critical potential</u> control points along the pathway;	P	<p><i>Category : SUBSTANTIVE (917) PPPO (17 Sep 2023 1:13 PM)</i> For consistency with normal documents.</p>
625	<u>historical records on pest management</u> ;	P	<p><i>Category : TECHNICAL (624) United States of America (7 Sep 2023 2:10 PM)</i> Seems redundant with the 1st para of this section.</p>

626	<u>p</u> otential negative effects of measures on commodity quality; and	P	Category : SUBSTANTIVE (1690) Australia (29 Sep 2023 5:58 AM) Remove point as not considered appropriate as part of the PRA. This point is covered further down in 4.2 of Annex 3.
626	<u>p</u> otential negative effects of <u>and</u> measures on commodity quality; and	P	Category : TECHNICAL (1526) European Union (27 Sep 2023 6:11 PM) We are not sure this is true. There is always some overlap between the assessment stage and the management stage but potential negative effects of measures seems to us to be a part of pest risk management - suggest changing para 620 (i.e. the chapeau) into 'may provide'.
626	<u>p</u> otential negative effects of measures on commodity quality; and	P	Category : TECHNICAL (1258) EPPO (26 Sep 2023 10:55 AM) We are not sure this is true. There is always some overlap between the assessment stage and the management stage but potential negative effects of measures seems to us to be a part of pest risk management - suggest changing para 620 (i.e. the chapeau) into 'may provide'.
626	potential negative effects of measures on commodity quality; and	C	Category : SUBSTANTIVE (1111) APPPC (26 Sep 2023 10:36 AM) Korea think that it is not appropriate to use the negative effects of measures on commodity quality as a source of information in the risk assessment of pests, can this information be obtained as a result of the pest risk assessment?
626	potential negative effects of measures on commodity quality; and	C	Category : SUBSTANTIVE (1075) Korea, Republic of (25 Sep 2023 7:18 AM) Korea think that it is not appropriate to use the negative effects of measures on commodity quality as a source of information in the risk assessment of pests, can this information be obtained as a result of the pest risk assessment?
626	potential negative effects of measures on commodity quality; and <u>-historical records of social and economic impact of the pest</u>	P	Category : SUBSTANTIVE (1058) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)

626	potential negative effects of measures on commodity quality; <u>and</u> <u>- estimates of the quarantine pests' likelihood of introduction and consequences</u>	P <i>Category : TECHNICAL (625) United States of America (7 Sep 2023 2:12 PM)</i> Important elements for selecting measures and their strengths.
627	any uncertainty associated with the pest (or pests) and the pathway.	C <i>Category : TECHNICAL (1059) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i> Add another point reading 'historical records of social and economic impact of the pest'
627	any uncertainty associated with the pest (or <u>pests) and pests</u>), the pathway, <u>and the estimate of the level of risk</u> .	P <i>Category : TECHNICAL (626) United States of America (7 Sep 2023 2:13 PM)</i> important for choosing the strength of measures
627	any uncertainty associated with the pest (or pests) and the pathway.	C <i>Category : TECHNICAL (616) Congo, DR (5 Sep 2023 10:49 AM)</i> potential social and economic impact of the pest
627	any uncertainty associated with the pest (or pests) and the pathway. <u>- potential social and economic impact of the pest</u>	P <i>Category : TECHNICAL (582) Mozambique (29 Aug 2023 3:14 PM)</i> We consider that this sentence fits as the output of the pest risk assessment as when accessing the risk information on the social and economic impact is gathered and is important to make a decision on the management options
629	4.1 Underlying principles	C <i>Category : EDITORIAL (918) PPPO (17 Sep 2023 1:13 PM)</i> PPPO suggests this section (4.1) be deleted as it is covered in ISPM No. 1.
630	The following four phytosanitary principles described in ISPM 1 should be taken into account when identifying appropriate pest risk management options:	C <i>Category : SUBSTANTIVE (1674) South Africa (28 Sep 2023 12:47 PM)</i> Proposal for addition of "not limited to other principles" between the words: "principles" and "described". this because there are other principles described in ISPM 1 such as transparency, technical justification which are also important when identifying pest risk management options.

630	The following four phytosanitary principles described in ISPM 1 should be taken into account when identifying appropriate pest risk management options, <u>in particular the following:</u>	P	Category : SUBSTANTIVE (825) COSAVE (12 Sep 2023 8:16 PM) All phytosanitary principles should be taken into account. More relevant are highlighted
630	The following four phytosanitary principles described in ISPM 1 should be taken into account when identifying appropriate pest risk management options, <u>in particular the following:</u>	P	Category : SUBSTANTIVE (677) Uruguay (7 Sep 2023 7:48 PM) All phytosanitary principles should be taken into account. More relevant are highlighted
631	<i>Necessity.</i> Phytosanitary measures should be limited to what is necessary to protect plant health. <u>- Managed risk. Phytosanitary measures should be based on a policy of managed risk, recognizing that risk of the spread and introduction of pests always exists when importing plants, plant products and other regulated</u>	P	Category : SUBSTANTIVE (826) COSAVE (12 Sep 2023 8:19 PM) Principle of managed risk added, being one of the more relevant principles for pest risk management options
631	<i>Necessity.</i> Phytosanitary measures should be limited to what is necessary to protect plant health. <u>- Managed risk. Phytosanitary measures should be based on a policy of managed risk, recognizing that risk of the spread and introduction of pests always exists when importing plants, plant products and other regulated</u>	P	Category : SUBSTANTIVE (678) Uruguay (7 Sep 2023 7:51 PM) Principle of managed risk added, being one of the more relevant principles for pest risk management options
632	<i>Minimal impact.</i> The IPPC (Article VII.2(g)) states that phytosanitary measures shall be consistent with the pest risk <u>involved, involved</u> and shall represent the least restrictive measures available that result in the minimum impediment to the international movement of people, commodities and conveyances.	P	Category : EDITORIAL (1527) European Union (27 Sep 2023 6:13 PM) Improved drafting.
632	<i>Minimal impact.</i> The IPPC (Article VII.2(g)) states that phytosanitary measures shall be consistent with the pest risk <u>involved, involved</u> and shall represent the least restrictive measures available that result in the minimum impediment to the international movement of people, commodities and conveyances.	P	Category : EDITORIAL (1259) EPPO (26 Sep 2023 10:55 AM) Improved drafting
633	Equivalence. If different phytosanitary measures providing the same level of protection are identified, they should be accepted as alternatives.	C	Category : TECHNICAL (617) Congo, DR (5 Sep 2023 11:01 AM) j accepte
633	Equivalence. If different phytosanitary measures providing the same level of protection are identified, they should be accepted as alternatives.	C	(303) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 6:01 PM] Red – the text is from ISPM11
635	Non-discrimination. If the pest under consideration is established in the PRA area but is of limited distribution and under official control, the phytosanitary measures	C	Category : TECHNICAL (618) Congo, DR (5 Sep 2023 11:02 AM)

	<p>in relation to import should not be more stringent than those applied within the PRA area. Likewise, phytosanitary measures should not discriminate between exporting countries where the status of the relevant pest is the same.</p>		j accepte
635	<p>Non-discrimination. If the pest under consideration is established in the PRA area but is of limited distribution and under official control, the phytosanitary measures in relation to import should not be more stringent than those applied within the PRA area. Likewise, phytosanitary measures should not discriminate between exporting countries where the status of the relevant pest is the same. - Environmental friendly. Pest risk management options should also consider the conservation of biodiversity</p>	P	<p>Category : TECHNICAL (583) Mozambique (29 Aug 2023 3:19 PM) We consider that when identifying risk management we also have to take into account the risk that the measure can pose to the environment, so the proposal is add this sentence if appropriate</p>
635	<p>Non-discrimination. If the pest under consideration is established in the PRA area but is of limited distribution and under official control, the phytosanitary measures in relation to import should not be more stringent than those applied within the PRA area. Likewise, phytosanitary measures should not discriminate between exporting countries where the status of the relevant pest is the same.</p>	C	<p>(304) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:49 PM] Red – the text is from ISPM11</p>
638	<p>Pest risk management options should be based on the risk of posed by the pest on a particular pathway and the intended use (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of risk may differ according to the pathway: for example, the presence of a pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption. Pest risk management options for the same pests may therefore vary according to the pathway. Furthermore, the types of measure identified as pest risk management options may vary according to the tolerance of the commodity to the measure.</p>	P	<p>Category : TECHNICAL (1532) European Union (27 Sep 2023 6:18 PM) More precise wording.</p>
638	<p>Pest risk management options should be based on the risk of the pest on a particular pathway and the intended use (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of risk may differ according to the pathway pathway and intended use: for example, the presence of a pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption. Pest risk management options for the same pests may therefore vary according to the pathway pathway and intended use. Furthermore, the types of measure identified as pest risk management options <u>for the same pest</u> may vary according to the tolerance of the commodity to the measure.</p>	P	<p>Category : TECHNICAL (1531) European Union (27 Sep 2023 6:17 PM) This paragraph seems to be talking about different management options for the same pest identified. It refers to both pathways and intended use - thus the additions.</p>

638	Pest risk management options should be based on the risk of the pest on a particular pathway and the intended use (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of risk may differ according to the pathway: for example, the presence of a pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption. Pest risk management options for the same pests may therefore vary according to the pathway. Furthermore, the types of measure identified as pest risk management options may vary according to the <u>tolerance of potential damage to the commodity to resulting from</u> the measure.	P	Category : TECHNICAL (1530) European Union (27 Sep 2023 6:15 PM) Not clear what is meant here. Is it the potential damage to the commodity resulting from the measures (e.g. a treatment)?
638	<u>Pest risk management options should be based on the risk posed by the pest on a particular pathway and intended use (further information is contained in ISPM 32 (Pest risk management options should be based on the risk of the pest on a particular pathway and the intended use (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of risk may differ according to the pathway: for example, the presence of a pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption. Pest risk management options for the same pests may therefore vary according to the pathway: for the same pest may vary according to the tolerance of potential damage to the commodity to resulting from the measure.</u>	P	Category : SUBSTANTIVE (1260) EPPO (26 Sep 2023 10:55 AM) Not clear what is meant here. Is it the potential damage to the commodity resulting from the measures (e.g. a treatment)? See suggestions. This paragraph seems to be talking about different management options for the same pest identified. It refers to both pathways and intended use - thus the additions. More precise wording has been proposed.
638	Pest risk management options should be based on the risk of the pest on a particular pathway and the intended use (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of <u>pest</u> risk may differ according to the pathway: <u>for example, the presence of a pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption</u> . Pest risk management options for the same pests may therefore vary according to the pathway. Furthermore, the types of measure identified as pest risk management options may vary according to the tolerance of the commodity to the measure.	P	Category : TECHNICAL (827) COSAVE (12 Sep 2023 8:20 PM) Example deleted because, it does not provide clarity
638	Pest risk management options should be based on the risk of the pest on a particular pathway and the intended use (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of <u>pest</u> risk may differ according to the pathway: <u>for example, the presence of a</u>	P	Category : TECHNICAL (679) Uruguay (7 Sep 2023 7:55 PM) Example deleted because, it does not provide clarity

	<p>pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption. Pest risk management options for the same pests may therefore vary according to the pathway. Furthermore, the types of measure identified as pest risk management options may vary according to the tolerance of the commodity to the measure.</p>		
638	Pest risk management options should be based on the risk of the pest on a particular pathway and the intended use <u>of the commodity</u> (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of risk may differ according to the pathway: for example, the presence of a pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption. Pest risk management options for the same pests may therefore vary according to the pathway. Furthermore, the types of measure identified as pest risk management options may vary according to the tolerance of the commodity to the measure.	P	<p>Category : TECHNICAL (648) United States of America (7 Sep 2023 4:06 PM) For clarity</p>
638	Pest risk management options should be based on the risk of the pest on a particular pathway and the intended use (further information is contained in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>)). The level of risk may differ according to the pathway: for example, the presence of a pest on nursery stock may pose a very different risk from the same pest being present on fruit for consumption. Pest risk management options for the same pests may therefore vary according to the pathway. Furthermore, the types of <u>measure measures</u> identified as pest risk management options may vary according to the tolerance of the commodity to the measure.	P	<p>Category : EDITORIAL (584) Mozambique (29 Aug 2023 3:21 PM) To be consistent grammatically</p>
639	<p><u>The pest risk may be sufficiently reduced to an acceptable level by relying on commercial production, pest-control in the field, and post-harvest procedures, i.e., inspection, culling, washing and brushing (depending on the commodity type).</u> <u>Depending on the intended use of the commodity, the pest risk may be sufficiently reduced to an acceptable level through basic measures including commercial production, pest control practices and inspection.</u></p>	P	<p>Category : TECHNICAL (649) United States of America (7 Sep 2023 4:11 PM) For clarity</p>
640	The major risk of introduction of pests is with imported consignments of plants and plant products, but (especially for a PRA performed on a particular pest) it is also necessary to consider the risk of introduction with other types of pathways (e.g. packing materials, conveyances, <u>goods and cargo</u> , travellers and their luggage, and the natural spread of a pest).	P	<p>Category : TECHNICAL (1672) New Zealand (28 Sep 2023 9:13 AM) additional examples</p>

640	The major risk of introduction of pests is with imported consignments of plants and plant products, but (especially for a PRA performed on a particular pest) it is also necessary to consider the risk of introduction with other types of pathways (e.g. <u>packing</u> , <u>Packaging</u> materials, conveyances, travellers and their luggage, and the natural spread of a pest).	P	<i>Category : SUBSTANTIVE (1060) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i>
640	The major risk of introduction of pests is with imported consignments of plants and plant products, but (especially for a PRA performed on a particular pest) it is also necessary to consider the risk of introduction with other types of pathways (e.g. packing materials, conveyances, travellers and their luggage, and the natural spread of a pest).	P	<i>Category : TECHNICAL (828) COSAVE (12 Sep 2023 8:22 PM) Redundant with section 3.1.1 of Annex 2.</i>
640	The major risk of introduction of pests is with imported consignments of plants and plant products, but (especially for a PRA performed on a particular pest) it is also necessary to consider the risk of introduction with other types of pathways (e.g. packing materials, conveyances, travellers and their luggage, and the natural spread of a pest).	P	<i>Category : TECHNICAL (680) Uruguay (7 Sep 2023 7:57 PM) Redundant with section 3.1.1 of Annex 2.</i>
642	Pest risk management options should be as precise as possible <u>as</u> to consignment type (hosts, parts of plants) and origin so as not to act as barriers to trade by limiting the import of products where this is not justified. Available measures considered as pest risk management options may be classified into broad categories relating to the pathway and the pest status in the country of origin. Measures may include those:	P	<i>Category : EDITORIAL (1533) European Union (27 Sep 2023 6:19 PM) Improved drafting.</i>
642	Pest risk management options should be as precise as possible <u>as</u> to consignment type (hosts, parts of plants) and origin so as not to act as barriers to trade by limiting the import of products where this is not justified. Available measures considered as pest risk management options may be classified into broad categories relating to the pathway and the pest status in the country of origin. Measures may include those:	P	<i>Category : EDITORIAL (1261) EPPO (26 Sep 2023 10:55 AM) Improved drafting</i>
643	applied to ensure the area or place of production or <u>site of</u> production <u>site</u> is free from the pest;	P	<i>Category : EDITORIAL (829) COSAVE (12 Sep 2023 8:27 PM) Glossary term</i>
643	applied to ensure the area or place of production or <u>site of</u> production <u>site</u> is free from the pest;	P	<i>Category : EDITORIAL (681) Uruguay (7 Sep 2023 7:59 PM) Glossary term</i>
644	applied to prevent or reduce <u>original the</u> infestation in the crop;	P	<i>Category : EDITORIAL (1534) European Union (27 Sep 2023 6:22 PM)</i>

			Why original ?
644	applied to prevent or reduce original -infestation in the crop;	P	<i>Category : EDITORIAL (1262) EPPO (26 Sep 2023 10:55 AM)</i> Why original?
645	applied to <u>reduce or remove infestation of</u> the consignment; or	P	<i>Category : EDITORIAL (1691) Australia (29 Sep 2023 6:00 AM)</i> Suggest add text to explain why measure is applied to consignment, consistent with other subpoints. Suggested additional text "to reduce or remove infestation"
645	applied to the consignment <ins>consignment to reduce, remove or treat the pest</ins> ; or	P	<i>Category : SUBSTANTIVE (919) PPPO (17 Sep 2023 1:13 PM)</i> For clarity and consistency with the two bullet points above.
645	applied to the consignment; or <u>- applied within the importing country</u>	P	<i>Category : TECHNICAL (830) COSAVE (12 Sep 2023 8:29 PM)</i> To include options mentioned in following sections
645	applied to the consignment; or <u>- applied within the importing country</u>	P	<i>Category : TECHNICAL (682) Uruguay (7 Sep 2023 8:02 PM)</i> To include options mentioned in following sections
647	Other options may arise in the PRA area, such as restrictions on the use of a commodity, introduction of a biological control agent, eradication and containment. Such options should also be evaluated and will apply in particular if the pest is already present but not widely distributed in the PRA area.	C	(305) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 18 May 2023 11:51 PM] Red – the text is from ISPM11
649	The strength of a measure identified as a pest risk management option (i.e. its overall effectiveness) should be consistent with the pest risk that it aims to address. ^[6] A stronger phytosanitary measure increases the level of confidence that the pest risk will be lowered. The level of risk reduction sought may be greater for a pest of high economic importance compared to a pest of lower economic importance.	C	<i>Category : SUBSTANTIVE (1675) South Africa (28 Sep 2023 12:48 PM)</i> Replacement of the word "stronger" with "appropriate level of protection"; This is to ensure proper usage of phytosanitary phrases.
649	The strength of a measure identified as a pest risk management option (i.e. its overall effectiveness) should be consistent with the pest risk that it aims to address. ^[6] A stronger phytosanitary measure increases the level of confidence that the pest risk will be lowered. The level of risk reduction sought may be greater for a pest of high economic importance compared to a pest of lower economic importance.	C	<i>Category : TECHNICAL (1535) European Union (27 Sep 2023 6:23 PM)</i> Is this note really a quote from the SPS or an interpretation?

649	The strength of a measure identified as a pest risk management option (i.e. its overall effectiveness) should be consistent with the pest risk that it aims to address. ^[6] A stronger phytosanitary measure increases the level of confidence that the pest risk will be lowered. The level of risk reduction sought may be greater for a pest of high economic importance compared to a pest of lower economic importance.	C	Category : TECHNICAL (1263) EPPO (26 Sep 2023 10:55 AM) Is this note really a quote from the SPS or an interpretation?
649	The strength of a measure identified as a pest risk management option (i.e. its overall effectiveness) should be consistent with the pest risk that it aims to address. ^[6] A stronger phytosanitary measure increases the level of confidence that the pest risk will be lowered. The <u>level strength</u> of <u>risk reduction sought</u> a <u>phytosanitary measure</u> may be greater for a pest of high economic importance compared to a pest of lower economic importance.	P	Category : TECHNICAL (758) Brazil (8 Sep 2023 4:46 PM) Phytosanitary measures are always applied to reduce pest risks, regardless of the importance of the pest. On the other hand, the strength of the measure can change according to the risk.
649	The strength of a measure identified as a pest risk management option (i.e. its overall effectiveness) should be consistent with the pest risk that it aims to address. ^[6] A stronger phytosanitary measure increases the level of confidence that the pest risk will be lowered. The level of risk reduction sought may be greater for a pest of <u>high-with estimated higher</u> economic <u>importance-consequences</u> compared to a pest of <u>with the lower economic importance ones</u> .	P	Category : TECHNICAL (653) United States of America (7 Sep 2023 4:16 PM) Clarity - the level of economic consequences is estimated for the area.
649	The strength of a measure identified as a pest risk management option (i.e. its overall effectiveness) should be consistent with the pest risk that it aims to address. ^[6] A stronger phytosanitary measure increases the level of confidence that the pest risk will be lowered. The level of risk reduction sought may be greater for a pest of high economic importance compared to a pest of lower economic importance.	C	Category : SUBSTANTIVE (651) United States of America (7 Sep 2023 4:13 PM) This is inconsistent with the section 5.4 and should be adjusted accordingly.
650	-The strength of measures is a concept found in the <u>the</u> SPS Agreement. It refers to the degree to which a measure is known to reduce the <u>incidence infestation level</u> of a viable, regulated pest in a commodity.	P	Category : EDITORIAL (658) United States of America (7 Sep 2023 4:21 PM) The word "incidence" is no longer a Glossary term.
651	4.4 Specificity in relation to risk	P	Category : TECHNICAL (831) COSAVE (12 Sep 2023 8:30 PM) We suggest to delete the section because the meaning is not clear. It is not clear as well, what is meant with "known and specific activity against a pest. On the other hand, examples of treatments are exclusively mentioned, being treatments only one option of pest risk management

651	4.4 Specificity in relation to risk	P	<i>Category : TECHNICAL</i> (683) Uruguay (7 Sep 2023 8:09 PM) We suggest to delete the section because the meaning is not clear. It is not clear as well, what is meant with "known and specific activity against a pest. On the other hand, examples of treatments are exclusively mentioned, being treatments only one option of pest risk management
652	Pest risk management options may be identified and selected on the basis of known and specific activity against a particular pest, or they may be less specific and have a broader spectrum of activity against a group of pests.	C	<i>Category : EDITORIAL</i> (1536) European Union (27 Sep 2023 6:24 PM) Not understood. What is meant here, "efficacy"? Not clear. In our understanding it also refers to feasibility. Additionally we have a general remark on the use of the terms 'Selection/selected': by who? A PRA assessor or a manager?
652	Pest risk management options may be identified and selected on the basis of known and specific activity against a particular pest, or they may be less specific and have a broader spectrum of activity against a group of pests.	C	<i>Category : TECHNICAL</i> (1264) EPPO (26 Sep 2023 10:55 AM) Not understood. What is meant here, "efficacy"? Not clear. In our understanding it also refers to feasibility. Additionally we have a general remark on the use of the terms 'Selection/selected': by who? A PRA assessor or a manager?
652	Pest risk management options may be identified and selected on the basis of known and specific activity against a particular pest, or they may be less specific and have a broader spectrum of activity against a group of pests.	P	<i>Category : TECHNICAL</i> (832) COSAVE (12 Sep 2023 8:32 PM) We suggest to delete the section because the meaning is not clear. It is not clear as well, what is meant with "known and specific activity against a pest. On the other hand, examples of treatments are exclusively mentioned, being treatments only one option of pest risk management
652	Pest risk management options may be identified and selected on the basis of known and specific activity against a particular pest, or they may be less specific and have a broader spectrum of activity against a group of pests.	P	<i>Category : TECHNICAL</i> (684) Uruguay (7 Sep 2023 8:09 PM) We suggest to delete the section because the meaning is not clear. It is not clear as well, what is meant with "known and specific activity against a pest. On the other hand, examples of treatments are exclusively mentioned, being treatments only one option of pest risk management
652	Pest risk management options may be identified and selected on the basis of known	P	<i>Category : TECHNICAL</i>

	and specific activity against a particular pest, or they may be less specific (generic) and have a broader spectrum of activity against a group of pests.	(655) United States of America (7 Sep 2023 4:17 PM) Clarity
653	Examples of measures with known and specific activity against a particular pest are provided in the annexes to ISPM 28 (<i>Phytosanitary treatments for regulated pests</i>).	C <i>Category : EDITORIAL (1537) European Union (27 Sep 2023 6:26 PM)</i> Same as in para 652: is it "efficacy"? "Efficacy" is used in ISPM 28, not "activity".
653	Examples of measures with known and specific activity against a particular pest are provided in the annexes to ISPM 28 (<i>Phytosanitary treatments for regulated pests</i>).	C <i>Category : EDITORIAL (1265) EPPO (26 Sep 2023 10:55 AM)</i> Same as above: is it "efficacy"? "Efficacy" is used in ISPM 28, not "activity".
653	<u>Examples of measures with known and specific activity against a particular pest are provided in the annexes to ISPM 28 (<i>Phytosanitary treatments for regulated pests</i>).</u>	P <i>Category : TECHNICAL (833) COSAVE (12 Sep 2023 8:34 PM)</i> We suggest to delete the section because the meaning is not clear. It is not clear as well, what is meant with "known and specific activity against a pest. On the other hand, examples of treatments are exclusively mentioned, being treatments only one option of pest risk management
653	<u>Examples of measures with known and specific activity against a particular pest are provided in the annexes to ISPM 28 (<i>Phytosanitary treatments for regulated pests</i>).</u>	P <i>Category : TECHNICAL (685) Uruguay (7 Sep 2023 8:09 PM)</i> We suggest to delete the section because the meaning is not clear. It is not clear as well, what is meant with "known and specific activity against a pest. On the other hand, examples of treatments are exclusively mentioned, being treatments only one option of pest risk management
654	4.5 Examples of pest risk management options	C <i>Category : SUBSTANTIVE (920) PPPO (17 Sep 2023 1:13 PM)</i> PPPO understands that sanitation can occur at any stage (pre-planting, pre-harvest, post harvest, etc.), therefore it should be included – suggest a global check.
654	<u>4.5 Examples of pest risk management options</u>	P <i>Category : TECHNICAL (834) COSAVE (12 Sep 2023 8:36 PM)</i> Title not needed
654	<u>4.5 Examples of pest risk management options</u>	P <i>Category : TECHNICAL (686) Uruguay (7 Sep 2023 8:11 PM)</i> Title not needed
654	<u>4.5 Examples of pest risk management options</u>	C <i>Category : EDITORIAL (603) Morocco (4 Sep 2023 11:14 AM)</i> It is recommended to classify management

			measures by their nature and not by production stages. Indeed, not all products covered by the PRA go through the steps mentioned. For example : 4.5.1- free areas/sites 4.5.2- treatment 4.5.3- inspection 4.5.4- testing
655	The following pest risk management options are examples of the measures that are most commonly applied to regulated articles in trade. They are applied to pathways, usually consignments of a host, from a specific origin and can be stand-alone or part of a systems approach. The list of options is not <u>exhaustive and includes measures that may already be considered as part of commercial production practices or imposed as phytosanitary measures to achieve a country's appropriate level of protection at the conclusion of the PRA process</u> exhaustive .	P	<i>Category : TECHNICAL (1538) European Union (27 Sep 2023 6:27 PM)</i> Level of detail not helpful and potentially confusing.
655	The following pest risk management options are examples of the measures that are most commonly applied to regulated articles in trade. They are applied to pathways, usually consignments of a host, from a specific origin and can be stand-alone or part of a systems approach. The list of options is not <u>exhaustive and includes measures that may already be considered as part of commercial production practices or imposed as phytosanitary measures to achieve a country's appropriate level of protection at the conclusion of the PRA process</u> exhaustive .	P	<i>Category : TECHNICAL (1266) EPPO (26 Sep 2023 10:55 AM)</i> Level of detail not helpful and potentially confusing
655	The following pest risk management options are examples of the measures that are most commonly applied to regulated articles in trade. <u>They are applied to pathways, usually consignments of a host, from a specific origin and can be stand-alone or part of a systems approach. The list of options is not exhaustive and includes measures that may already be considered as part of commercial production practices or imposed as phytosanitary measures to achieve a country's appropriate level of protection at the conclusion of the PRA process.</u>	P	<i>Category : TECHNICAL (835) COSAVE (12 Sep 2023 8:36 PM)</i> A SA is one of the options for pest risk management option. Deleted text may lead to the understanding that the measures applied under a SA would be pest risk management options.
655	The following pest risk management options are examples of the measures that are most commonly applied to regulated articles in trade. <u>They are applied to pathways, usually consignments of a host, from a specific origin and can be stand-alone or part of a systems approach. The list of options is not exhaustive and includes measures that may already be considered as part of commercial production practices or imposed as phytosanitary measures to achieve a country's appropriate level of protection at the conclusion of the PRA process.</u>	P	<i>Category : TECHNICAL (687) Uruguay (7 Sep 2023 8:16 PM)</i> A SA is one of the options for pest risk management option. Deleted text may lead to the understanding that the measures applied under a SA would be pest risk management options.

	appropriate level of protection at the conclusion of the PRA process.		
656	<u>4.5.1 Pre-planting options</u> <u>1 Options to ensure the area or place of production or production site is free from the pest</u>	P	<i>Category : TECHNICAL (836) COSAVE (12 Sep 2023 8:41 PM)</i> Text from ISPM 11 to improve understanding and also for consistency with categories described in section 4.3
656	<u>4.5.1 Pre-planting options</u> <u>Options to ensure the area or place of production or production site is free from the pest</u>	P	<i>Category : TECHNICAL (688) Uruguay (7 Sep 2023 8:24 PM)</i> Text from ISPM 11 to improve understanding and also for consistency with categories described in section 4.3
657	Measures aimed at achieving pest freedom <ins>may include pestfree area, either spatially or temporally</ins> pest free place of production, may be applied before planting <ins>pest free production site.</ins>	P	<i>Category : TECHNICAL (837) COSAVE (12 Sep 2023 8:43 PM)</i> Text from section 3.4.3 of ISPM 11
657	Measures aimed at achieving pest freedom <ins>freedom or low pest prevalence</ins> , either spatially or temporally, may be applied before planting.	P	<i>Category : TECHNICAL (762) Brazil (8 Sep 2023 6:17 PM)</i> For consistency with the follow paragraph
657	Measures aimed at achieving <ins>may include</ins> pest freedom <ins>free area, either spatially or temporally</ins> pest free place of production, may be applied before planting <ins>pest free production site.</ins>	P	<i>Category : TECHNICAL (689) Uruguay (7 Sep 2023 8:35 PM)</i> Text from section 3.4.3 of ISPM 11
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>), ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>), ISPM 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>)). Requirements for areas of low pest prevalence are described in ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>).	P	<i>Category : TECHNICAL (1692) Australia (29 Sep 2023 6:01 AM)</i> While areas of low pest prevalence (ALPP) is relevant to pre-planting measure options, it should be listed separately instead of including here with the linkage to PFA, PFPP and PFPS (as they are very different). ALPP does not fall under the concept of area freedom. Suggest simply present it in a separate sentence.
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>), ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>)) and ISPM 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>)).	P	<i>Category : EDITORIAL (1539) European Union (27 Sep 2023 6:29 PM)</i> Improved drafting.
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of</i>	P	<i>Category : EDITORIAL (1267) EPPO (26 Sep 2023 10:55 AM)</i> Improved drafting

	<i>pest free places of production and pest free production sites), ISPM 22 (Requirements for the establishment of areas of low pest prevalence) and ISPM 26 (Establishment of pest free areas for fruit flies (Tephritidae))).</i>		
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>), ISPM 22 (Requirements for the establishment of areas of low pest prevalence) , ISPM 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>)).	P	<i>Category : TECHNICAL (839) COSAVE (12 Sep 2023 8:45 PM)</i> ISPM 22 is for areas of low pest prevalence
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>), ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>), ISPM 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>)). 4.3.2 Options applied to prevent or reduce infestation in the crop 4.3.2.1 Pre-planting and during growing period options Measures aimed at achieving pest freedom, either spatially or temporally, may be applied before planting	P	<i>Category : TECHNICAL (838) COSAVE (12 Sep 2023 8:45 PM)</i> Title added to to classify the options in the categories mentioned in section 4.3
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>), ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>), ISPM 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>)). Specific surveillance to support the pest status in an area should follow ISPM 6 (Surveillance).	P	<i>Category : TECHNICAL (764) Brazil (8 Sep 2023 6:36 PM)</i> ISPM 6 is an important ISPM to support pest freedom and low prevalence sites
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>), ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>), ISPM 26	P	<i>Category : TECHNICAL (691) Uruguay (7 Sep 2023 8:46 PM)</i> Title added to to classify the options in the categories mentioned in section 4.3

	(Establishment of pest free areas for fruit flies (Tephritidae))). <u>4.3.2 Options applied to prevent or reduce infestation in the crop</u> <u>4.3.2.1 Pre-planting and during growing period options</u> <u>Measures aimed at achieving pest freedom, either spatially or temporally, may be applied before planting</u>		
658	Requirements for pest free areas, pest free places of production and pest free production sites are described in several ISPMs (e.g. ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>), ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>), ISPM 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>)).	P	<i>Category : TECHNICAL</i> (690) Uruguay (7 Sep 2023 8:40 PM) ISPM 22 is for areas of low pest prevalence
659	<u>In a pest free</u> During the growing period, monitoring is carried out, based on the life cycle of the pest and the host, to verify that the pest is not detected during the growing period. Pest free growing periods are sometimes also linked to a pest-control programme.	P	<i>Category : EDITORIAL</i> (1542) European Union (27 Sep 2023 6:33 PM) Not understood why not simply: "During the growing period".
659	<u>In a pest free growing period</u> , monitoring is carried out, based on the life cycle of the pest and the host, to verify that the pest is not detected during the growing period. Pest free growing periods are sometimes also linked to a pest-control programme.	C	<i>Category : EDITORIAL</i> (1541) European Union (27 Sep 2023 6:32 PM) Is this a pre-planting option if a reference is made to a growing period? Perhaps is better to move this paragraph to the next section 4.5.2.
659	In a pest free growing period, monitoring is carried out, based on the life cycle of the pest and the host, to verify that the pest is not detected <u>during the growing period</u> . Pest free growing periods are sometimes also linked to a pest-control programme.	C	<i>Category : EDITORIAL</i> (1540) European Union (27 Sep 2023 6:31 PM) Already said at the start or we miss the objective.
659	<u>In a pest free growing period</u> , monitoring is carried out, based on the life cycle of the pest and the host, to verify that the pest is not detected during the growing period. Pest free growing periods are sometimes also linked to a pest-control programme.	C	<i>Category : TECHNICAL</i> (1415) India (27 Sep 2023 10:45 AM) This para may be more appropriate in 4.5.2
659	<u>In a pest free</u> During the growing period, monitoring is carried out, based on the	P	<i>Category : EDITORIAL</i>

	life cycle of the pest and the host, to verify that the pest is not detected during the growing period. Pest free growing periods are sometimes also linked to a pest-control programme.		(1269) EPPO (26 Sep 2023 10:55 AM) Not understood why not simply: "During the growing period". Is this a pre-planting option if a reference is made to a growing period? Perhaps is better to move this paragraph to the next section 4.5.2.
659	In a pest free growing period, monitoring is carried out, based on the life cycle of the pest and the host, to verify that the pest is not detected during the growing period . Pest free growing periods are sometimes also linked to a pest-control programme.	C	<i>Category : EDITORIAL</i> (1268) EPPO (26 Sep 2023 10:55 AM) Already said at the start or we miss the objective.
659	<i>In a pest free growing period, monitoring is carried out, based on the life cycle of the pest and the host, to verify that the pest is not detected during the growing period. Pest free growing periods are sometimes also linked to a pest control programme.</i>	P	<i>Category : TECHNICAL</i> (763) Brazil (8 Sep 2023 6:35 PM) Once this paragraph refers to GROWING period, it should be moved to the next section ("Pre-harvest options")
660	4.5.2.2 Pre-harvest options	P	<i>Category : EDITORIAL</i> (692) Uruguay (7 Sep 2023 8:53 PM) Consequential change
661	Measures may be applied during production to manage specific pests. These may include the application of agrochemicals, biological control agents, physical pest exclusion measures, mating disruption, surveillance and sanitation methods. Sanitation includes activities that are designed to remove materials that may attract or harbour quarantine pests, for example removing fallen fruit from orchards, destroying or ploughing-under crop residues, weed control or other similar activities.	C	<i>Category : TRANSLATION</i> (841) COSAVE (12 Sep 2023 8:48 PM) "manage" should be translated as "manejo"
661	Measures may be applied during production to manage specific pests. These may include the application of agrochemicals, biological control agents, physical pest exclusion measures, mating disruption, surveillance and sanitation methods. Sanitation includes activities that are designed to remove materials that may attract or harbour quarantine pests, for example removing fallen fruit from orchards, destroying or ploughing-under crop residues, weed control or other similar activities. <u>Production in a certification scheme for plants for planting. An officially monitored plant production scheme usually includes a number of controlled generations, beginning with nuclear stock plants of high health status. It may be specified that the plants be derived from plants within a limited number of generations</u>	P	<i>Category : TECHNICAL</i> (840) COSAVE (12 Sep 2023 8:47 PM) From ISPM 11 Section 3.4.2

661	Measures may be applied during production to manage specific pests. These may include the application of agrochemicals, <u>the use of</u> biological control agents, physical pest exclusion measures, mating disruption <u>and disruption techniques</u> , surveillance and sanitation methods. Sanitation includes activities that are designed to remove materials that may attract or harbour quarantine pests, for example removing fallen fruit from orchards, destroying or ploughing-under crop residues, weed control or other similar activities.	P	<i>Category : EDITORIAL (766) Brazil (8 Sep 2023 6:51 PM)</i>
661	Measures may be applied during production to manage specific pests. These may include the application of <u>agrochemicals</u> <u>pesticides</u> , biological control agents, physical pest exclusion measures, mating disruption, surveillance and sanitation methods. Sanitation includes activities that are designed to remove materials that may attract or harbour quarantine pests, for example removing fallen fruit from orchards, destroying or ploughing-under crop residues, weed control or other similar activities.	P	<i>Category : TECHNICAL (759) Brazil (8 Sep 2023 4:52 PM)</i> "Pesticide" is a broader term and, according to FAO, includes biological and chemical products
661	Measures may be applied during production to manage specific pests. These may include the application of agrochemicals, biological control agents, physical pest exclusion measures, mating disruption, surveillance and sanitation methods. Sanitation includes activities that are designed to remove materials that may attract or harbour quarantine pests, for example removing fallen fruit from orchards, destroying or ploughing-under crop residues, weed control or other similar activities. <u>Production in a certification scheme for plants for planting. An officially monitored plant production scheme usually includes a number of controlled generations, beginning with nuclear stock plants of high health status. It may be specified that the plants be derived from plants within a limited number of generations</u>	P	<i>Category : TECHNICAL (720) Uruguay (8 Sep 2023 3:34 PM)</i> From ISPM 11 Section 3.4.2
661	Measures may be applied during production to manage specific pests. These may include the application of agrochemicals, biological control agents, physical pest exclusion measures, mating disruption, surveillance and sanitation methods. Sanitation includes activities that are designed to remove materials that may attract or harbour quarantine pests, for example removing fallen fruit from orchards, destroying or ploughing-under crop residues, weed control or other similar activities.	C	<i>Category : TRANSLATION (693) Uruguay (7 Sep 2023 8:54 PM)</i> "manage" should be translated as "manejo"

662	Physical pest-exclusion measures may include growing in protected conditions (e.g. <u>glasshouse</u> <u>greenhouse</u> , fruit bagging).	P	<i>Category : SUBSTANTIVE (1112) APPC (26 Sep 2023 10:36 AM)</i> glasshouse and plastic greenhouse are parts of greenhouse.
662	<u>In a pest free growing period, detection surveys are carried out to determine if the pest is not detected during the growing period. These surveys should be performed in accordance to ISPM 6. Pest free growing periods are sometimes also linked to a pest-control programme.</u> Physical pest-exclusion measures may include growing in protected conditions (e.g. glasshouse, fruit bagging).	P	<i>Category : TECHNICAL (765) Brazil (8 Sep 2023 6:38 PM)</i> Moved from the section above, once it refers to "growing period" instead of "pre-planting period". Some changes are necessary to align with definition os "detection survey" (instead of "monitoring") in ISPM 6.
663	4.5.3 Options at harvest <u>3 Harvest options</u>	P	<i>Category : EDITORIAL (1665) China (28 Sep 2023 3:22 AM)</i> To keep the consistency with the title of other sections, change "Options at harvest" to "Harvest options".
663	4.53.2.3 Options at harvest	P	<i>Category : EDITORIAL (694) Uruguay (7 Sep 2023 8:55 PM)</i> Consequential change
667	<u>sanitation (e.g. sanitation, for example removal of contaminating articles, waste material, infested products)</u> <u>products</u> ;	P	<i>Category : EDITORIAL (1544) European Union (27 Sep 2023 6:38 PM)</i> Improved drafting. Also see general comment on e.g. and for example.
667	sanitation <u>(e.g. for example removal of contaminating articles, waste material, infested products)</u> <u>products</u> ;	P	<i>Category : EDITORIAL (1270) EPPO (26 Sep 2023 10:55 AM)</i> Improved drafting. Also see general comment on e.g. and for example
668	defining the timing of imports (whereby the importing country defines times of the year that a particular quarantine pest cannot survive <u>(e.g. winter)</u> as "arrival windows", during which the import of goods that may be infested with the pest is permitted).	P	<i>Category : EDITORIAL (1546) European Union (27 Sep 2023 6:40 PM)</i> Improved drafting.
668	defining the timing of imports (whereby the importing country defines times of the year that a particular quarantine pest cannot <u>survive (e.g. winter)</u> <u>survive</u> as "arrival windows", during which the import of goods that may be infested with the pest is permitted).	P	<i>Category : EDITORIAL (1271) EPPO (26 Sep 2023 10:55 AM)</i> Improved drafting.
668	<u>defining the timing of imports (whereby the importing country defines times of the year that a particular quarantine pest cannot survive (e.g. winter) as "arrival windows", during which the import of goods that may be infested with the pest is permitted).</u>	P	<i>Category : TECHNICAL (767) Brazil (8 Sep 2023 7:02 PM)</i> The timing of imports is better defined in the "post-harvest options" section

669	4.53.2.4 Post-harvest options	P	<i>Category : EDITORIAL (695) Uruguay (7 Sep 2023 8:56 PM)</i> Consequential change
670	A commodity may be processed and handled after harvest to <u>eliminate or</u> reduce the pest risk posed by certain pests. Information about processing and handling of commodities and the resulting reduction in pest risk is provided in ISPM 32. Some examples include:	P	<i>Category : TECHNICAL (1693) Australia (29 Sep 2023 6:03 AM)</i> ISPM 32 provide examples of processing method/degree where processed commodities are no longer capable of being infested by pests, as well as those that reduce the pest risk but some risk remains.
670	A commodity may be processed and handled after harvest to reduce <u>or eliminate</u> the pest risk posed by certain pests. Information about processing and handling of commodities and the resulting reduction in pest risk is provided in ISPM 32. Some examples include:	P	<i>Category : EDITORIAL (921) PPPO (17 Sep 2023 1:13 PM)</i> PPPO understands that certain treatments can eliminate pest risks as opposed to just reducing.
672	removal of infested and damaged <u>fruitmaterial</u> ;	P	<i>Category : EDITORIAL (1694) Australia (29 Sep 2023 6:03 AM)</i> replace the word 'fruit' with 'material' or 'commodity' or similar. Fruit narrows the scope of this point and does not represent all types of pathways (e.g. nursery stock, grains, seeds)
672	removal of infested and damaged <u>fruitcommodity</u> ;	P	<i>Category : EDITORIAL (922) PPPO (17 Sep 2023 1:13 PM)</i> PPPO suggests fruit be replaced with commodity for consistency.
674	removal of leaves, stems or bark. <u>-safe transport (production unit to processing unit, processing unit to storage and storage to export points etc.)</u>	P	<i>Category : SUBSTANTIVE (1416) India (27 Sep 2023 10:50 AM)</i> Safe transport in cleaned and insect proof vehicle is an important practice
674	removal of leaves, <u>stems or stems</u> , bark, <u>other materials or contaminants that are not part of the traded commodity</u> .	P	<i>Category : SUBSTANTIVE (923) PPPO (17 Sep 2023 1:13 PM)</i> To capture all other potential risk materials that can be moved with a traded commodity.
674	removal of leaves, stems or bark. <u>4.3.3 Options applied to consignments</u> <u>Measures may include any combinations of the following:</u> <u>-Inspection or testing for freedom from a pest – sample size should be adequate to give an acceptable probability of detecting the pest.</u>	P	<i>Category : TECHNICAL (842) COSAVE (12 Sep 2023 8:50 PM)</i> Text from ISPM 11 to complete the categories described in section 4.3

	<ul style="list-style-type: none"> <u>- prohibition of parts of the host</u> <u>- specified conditions of preparation of the consignment (e.g. handling to prevent infestation or reinfestation)</u> <u>- specified treatment of the consignment – such treatments are applied post-harvest and could include chemical, thermal, irradiation or other physical methods.</u> 		
674	<p>removal of leaves, stems or bark.</p> <p><u>The importing country can define times of the year as “arrival windows”, when a particular quarantine pest cannot survive (e.g. winter), during which the import of goods that may be infested is permitted.</u></p>	P	<p>Category : TECHNICAL (768) Brazil (8 Sep 2023 7:14 PM) Moved from "harvest options" once IMPORTING refers to post-harvest timing. Arrangements in text suggested for better clarification</p>
674	<p>removal of leaves, stems or bark.</p> <p><u>4.3.3 Options applied to consignments</u></p> <p><u>Measures may include any combinations of the following:</u></p> <p><u>-Inspection or testing for freedom from a pest – sample size should be adequate to give an acceptable probability of detecting the pest.</u></p> <ul style="list-style-type: none"> <u>- prohibition of parts of the host</u> <u>- specified conditions of preparation of the consignment (e.g. handling to prevent infestation or reinfestation)</u> <u>- specified treatment of the consignment – such treatments are applied post-harvest and could include chemical, thermal, irradiation or other physical methods.</u> 	P	<p>Category : TECHNICAL (696) Uruguay (7 Sep 2023 9:01 PM) Text from ISPM 11 to complete the categories described in section 4.3</p>
674	removal of leaves, stems or bark.	C	<p>Category : TECHNICAL (661) United States of America (7 Sep 2023 4:23 PM) What about phytosanitary measures such as quarantine treatments?</p>
675	<u>4.5.5 Post-entry options</u> <u>5 Options within the importing country</u>	P	<p>Category : TECHNICAL (843) COSAVE (12 Sep 2023 8:51 PM) More appropriate title for the section</p>
675	<u>4.5.5 Post-entry options</u> <u>4 Options within the importing country</u>	P	<p>Category : TECHNICAL (697) Uruguay (7 Sep 2023 9:06 PM)</p>

			More appropriate title for the section
678	<u>Requirement to undergo processing procedures prior to being released for intended use</u> <u>limits on the intended use of the commodity (e.g. limited to processing only);</u>	P	<p>Category : TECHNICAL (1695) Australia (29 Sep 2023 6:14 AM)</p> <p>Request the steward to clarify if this point is referring to post-entry processing. Some goods are required to undergo processing prior to being released for the intended use (e.g. peanuts in shell). If that is the intent of the point, then we suggest wording such as 'requiring to undergo processing procedures prior to being released for the intended use'. Limits on the intended use should be a pre-entry option.</p>
678	limits on the intended use of the commodity (e.g. commodity, for example) limited to processing only <ins>only</ins> ;	P	<p>Category : EDITORIAL (1548) European Union (27 Sep 2023 6:41 PM)</p> <p>Improved drafting. Also see general comment on e.g. and for example.</p>
678	limits on the intended use of the commodity (e.g.-for example) limited to processing only <ins>only</ins> ;	P	<p>Category : EDITORIAL (1272) EPPO (26 Sep 2023 10:55 AM)</p> <p>Improved drafting. Also see general comment on e.g. and for example</p>
681	4.5.6 Other options relevant for all steps	P	<p>Category : TECHNICAL (844) COSAVE (12 Sep 2023 8:51 PM)</p> <p>We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned</p>
681	4.5.6 Other options relevant for all steps	P	<p>Category : TECHNICAL (698) Uruguay (7 Sep 2023 9:08 PM)</p> <p>We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned</p>
682	4.5.6.1 Testing	P	<p>Category : TECHNICAL (845) COSAVE (12 Sep 2023 8:52 PM)</p> <p>We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned</p>
682	4.5.6.1 Testing	P	<p>Category : TECHNICAL (699) Uruguay (7 Sep 2023 9:09 PM)</p> <p>We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned</p>
683	Some pests such as pathogens may infest a plant without producing symptoms, or	P	<p>Category : EDITORIAL (1072) Japan (25 Sep 2023 4:28 AM)</p>

	symptoms may be masked, and therefore <u>testing based on sampling test</u> may be required.		The definition of 'Test' includes sampling.
683	Some pests such as pathogens may infest a plant without producing symptoms, or symptoms may be masked, and therefore testing based on sampling may be required.	P	<i>Category : TECHNICAL (846) COSAVE (12 Sep 2023 8:53 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
683	Some pests such as pathogens may infest a plant without producing symptoms, or symptoms may be masked, and therefore . <u>Insect larvae or some weed seeds may be difficult to identify at species level under inspection. In such situations</u> testing <u>based on sampling</u> may be required <u>required</u> to determine if pests are present or to identify the pest.	P	<i>Category : TECHNICAL (781) Brazil (8 Sep 2023 8:53 PM)</i> To give more examples and align with the definition of pest in ISPM 5.
683	Some pests such as pathogens may infest a plant without producing symptoms, or symptoms may be masked, and therefore testing based on sampling may be required.	P	<i>Category : TECHNICAL (700) Uruguay (7 Sep 2023 9:09 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
683	Some pests such as pathogens may infest a plant without producing symptoms, or symptoms may be masked, and therefore testing based on <u>specified</u> sampling <u>method</u> may be required.	P	<i>Category : SUBSTANTIVE (571) Thailand (16 Aug 2023 10:22 AM)</i> A term "sampling" should be replaced by "specified sampling method" to scope down the various method of samplings.
684	Even when symptoms are present, testing based on sampling may be required to identify or confirm the causal organism.	P	<i>Category : TECHNICAL (847) COSAVE (12 Sep 2023 8:53 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
684	Even when symptoms are present, testing based on sampling may be required to identify or confirm the causal organism.	P	<i>Category : TECHNICAL (701) Uruguay (7 Sep 2023 9:09 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
684	Even when symptoms are present, testing based on <u>selective or targeted</u> sampling may be required to identify or confirm the causal organism.	P	<i>Category : SUBSTANTIVE (572) Thailand (16 Aug 2023 10:26 AM)</i> A term "sampling" should be referred to "selective or targeted sampling" to specify the sampling method used when the symptoms are present.
685	4.5.6.2 Treatments	P	<i>Category : TECHNICAL (848) COSAVE (12 Sep 2023 8:54 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already

			included in the options previously mentioned
685	4.5.6.2 Treatments	P	<i>Category : TECHNICAL (702) Uruguay (7 Sep 2023 9:10 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
686	Treatments maybe applied at various stages in the production cycle to mitigate pest risk. Treatments <u>maybe may be</u> applied singly or in combination with other treatments or measures.	P	<i>Category : EDITORIAL (1697) Australia (29 Sep 2023 6:15 AM)</i> typo
686	Treatments <u>maybe may be</u> applied at various stages in the production cycle to mitigate pest risk. Treatments maybe applied singly or in combination with other treatments or measures.	P	<i>Category : EDITORIAL (1696) Australia (29 Sep 2023 6:15 AM)</i> typo
686	Treatments maybe applied at various stages in the production cycle to mitigate pest risk. Treatments maybe applied singly or in combination with other treatments or measures.	C	<i>Category : TECHNICAL (1558) European Union (27 Sep 2023 6:51 PM)</i> Is production cycle meant until harvest? Treatments could be performed after harvest - perhaps to add " or after harvest".
686	Treatments <u>maybe may be</u> applied at various stages in the production cycle to mitigate pest risk. Treatments <u>maybe may be</u> applied singly or in combination with other treatments or measures.	P	<i>Category : EDITORIAL (1550) European Union (27 Sep 2023 6:43 PM)</i> Corrected.
686	Treatments maybe applied at various stages in the production cycle to mitigate pest risk. Treatments maybe applied singly or in combination with other treatments or measures.	C	<i>Category : TECHNICAL (1274) EPPO (26 Sep 2023 10:55 AM)</i> Is production cycle meant until harvest? Treatments could be performed after harvest - perhaps to add " or after harvest"
686	Treatments <u>maybe may be</u> applied at various stages in the production cycle to mitigate pest risk. Treatments <u>maybe may be</u> applied singly or in combination with other treatments or measures.	P	<i>Category : EDITORIAL (1273) EPPO (26 Sep 2023 10:55 AM)</i> Improved drafting.
686	Treatments <u>maybe may be</u> applied at various stages in the production cycle to mitigate pest risk. Treatments <u>maybe may be</u> applied singly or in combination with other treatments or measures.	P	<i>Category : EDITORIAL (1037) Canada (21 Sep 2023 10:13 PM)</i> correct use of terminology
686	Treatments maybe applied at various stages in the production cycle to mitigate pest risk. Treatments maybe applied singly or in combination with other treatments or measures.	P	<i>Category : TECHNICAL (849) COSAVE (12 Sep 2023 8:54 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
686	Treatments maybe applied at various stages in the production cycle to mitigate pest risk. Treatments maybe applied singly or in combination with other treatments or measures.	P	<i>Category : TECHNICAL (703) Uruguay (7 Sep 2023 9:10 PM)</i> We suggest to delete Section 4.5.6, tests,

	measures:		treatments and inspection are already included in the options previously mentioned
686	Treatments maybe applied at various stages in the production cycle to mitigate pest risk. Treatments maybe applied singly or in combination with other treatments or measures.	C	<i>Category : TECHNICAL (662) United States of America (7 Sep 2023 4:24 PM)</i> The below, seem to be intended for post-harvest stage in the production cycle.
687	Examples of treatments include:	P	<i>Category : TECHNICAL (850) COSAVE (12 Sep 2023 8:55 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
687	Examples of treatments include:	P	<i>Category : TECHNICAL (704) Uruguay (7 Sep 2023 9:10 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
688	physical methods (e.g. brushing and washing);	C	<i>Category : TECHNICAL (1560) European Union (27 Sep 2023 6:52 PM)</i> Bagging, culling and grading were also included in the previous draft version.
688	physical methods (e.g. brushing and washing);	C	<i>Category : TECHNICAL (1275) EPPO (26 Sep 2023 10:55 AM)</i> Bagging, culling and grading were also included in the previous draft version.
688	physical methods (e.g. brushing and washing);	C	<i>Category : EDITORIAL (1113) APPPC (26 Sep 2023 10:36 AM)</i> Propose to use term "mechanical" to replace "physical" – to avoid using the same terms as those used for treatment with environmental manipulation
688	physical methods (e.g. brushing and washing);	P	<i>Category : TECHNICAL (851) COSAVE (12 Sep 2023 8:56 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
688	physical methods (e.g. brushing and washing);	P	<i>Category : TECHNICAL (705) Uruguay (7 Sep 2023 9:10 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
689	chemical treatments (e.g. application of fumigants, aerosols, mists, fogs, dusts, dips, granules, sprays);	P	<i>Category : TECHNICAL (852) COSAVE (12 Sep 2023 8:57 PM)</i>

			We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
689	chemical treatments (e.g. application of fumigants, aerosols, mists, fogs, dusts, dips, granules, sprays);	P	<i>Category : TECHNICAL (706) Uruguay (7 Sep 2023 9:11 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
690	Physical temperature treatments (e.g. hot water immersion, hot air treatment, vapour heat treatment, cold treatment);	P	<i>Category : EDITORIAL (1092) Korea, Republic of (26 Sep 2023 6:34 AM)</i> Korea propose to use same terms as those used for ISPM28 (Phytosanitary treatments for regulated pest). In the ISPM28, heat and cold treatment was mentioned as physical.
690	temperature treatments (e.g. hot water immersion, hot air treatment, vapour heat treatment, cold treatment);	P	<i>Category : TECHNICAL (853) COSAVE (12 Sep 2023 8:58 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
690	temperature treatments (e.g. hot water immersion, hot air treatment, vapour heat treatment, cold treatment);	P	<i>Category : TECHNICAL (707) Uruguay (7 Sep 2023 9:11 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
691	modified atmosphere treatments;	C	<i>Category : EDITORIAL (1698) Australia (29 Sep 2023 6:16 AM)</i> Consider providing a couple of examples for modified atmosphere treatment in line with other subpoints here.
691	modified atmosphere treatments;	P	<i>Category : TECHNICAL (854) COSAVE (12 Sep 2023 8:59 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
691	modified atmosphere treatments;	P	<i>Category : TECHNICAL (708) Uruguay (7 Sep 2023 9:11 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
692	irradiation (e.g. gamma, X-ray, microwave); and	P	<i>Category : TECHNICAL (855) COSAVE (12 Sep 2023 8:59 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already

			included in the options previously mentioned
692	irradiation (e.g. gamma, X ray, microwave); and	P	<i>Category : TECHNICAL (709) Uruguay (7 Sep 2023 9:11 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
693	biological control.	P	<i>Category : SUBSTANTIVE (1085) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:33 PM)</i> Already included in 4.1.2 and not applicable
693	biological control.	P	<i>Category : TECHNICAL (856) COSAVE (12 Sep 2023 9:00 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
693	biological control.	P	<i>Category : TECHNICAL (710) Uruguay (7 Sep 2023 9:12 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
694	4.5.6.4 <u>3</u> Inspection	P	<i>Category : EDITORIAL (1073) Japan (25 Sep 2023 4:30 AM)</i>
694	4.5.6.4 <i>Inspection</i>	P	<i>Category : TECHNICAL (857) COSAVE (12 Sep 2023 9:00 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
694	4.5.6.4 <i>Inspection</i>	P	<i>Category : TECHNICAL (711) Uruguay (7 Sep 2023 9:12 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
695	Inspection may be used as a phytosanitary measure or to verify the effectiveness of phytosanitary measures. The factors to consider when deciding to use inspection as a phytosanitary measure are described in ISPM 23 (Guidelines for inspection).	P	<i>Category : TECHNICAL (858) COSAVE (12 Sep 2023 9:00 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned
695	Inspection may be used as a phytosanitary measure or to verify the effectiveness of phytosanitary measures. The factors to consider when deciding to use inspection as a phytosanitary measure are described in ISPM 23 (Guidelines for inspection).	P	<i>Category : TECHNICAL (712) Uruguay (7 Sep 2023 9:12 PM)</i> We suggest to delete Section 4.5.6, tests, treatments and inspection are already included in the options previously mentioned

696	4.53.7 5 Systems approaches	P	Category : EDITORIAL (714) Uruguay (7 Sep 2023 9:16 PM) Consequential change
697	<u>Pest risk management options can be integrated in a systems approach.</u> Systems approaches offer a possible way to address the variability and uncertainty of individual measures by combining measures to meet the level of pest risk deemed to be acceptable.	P	Category : TECHNICAL (859) COSAVE (12 Sep 2023 9:02 PM) To clarify that the SA is an option for pest risk management
697	<u>Pest risk management options can be integrated in a systems approach.</u> Systems approaches offer a possible way to address the variability and uncertainty of individual measures by combining measures to meet the level of pest risk deemed to be acceptable.	P	Category : TECHNICAL (715) Uruguay (7 Sep 2023 9:21 PM) To clarify that the SA is an option for pest risk management
698	ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>) provides guidance on the development and evaluation of systems approaches. <u>ISPM 35 (Systems approach for pest risk management of fruit flies (Tephritidae) provides guidance on the development, implementation and verification of integrated measures in a systems approach as an option for pest risk management of fruit flies (Tephritidae)</u>	P	Category : TECHNICAL (860) COSAVE (12 Sep 2023 9:03 PM) To include all ISPM related with SA
698	ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>) provides guidance on the development and evaluation of systems approaches. <u>ISPM 35 (Systems approach for pest risk management of fruit flies (Tephritidae) provides guidance on the development, implementation and verification of integrated measures in a systems approach as an option for pest risk management of fruit flies (Tephritidae)</u>	P	Category : TECHNICAL (716) Uruguay (7 Sep 2023 9:22 PM) To include all ISPM related with SA
699	ISPM 36 (<i>Integrated measures for plants for planting</i>) provides specific guidance on the use of integrated measures to manage the risk of plants for planting in international trade.	C	Category : TECHNICAL (1699) Australia (29 Sep 2023 6:16 AM) ISPM 35: systems approach for pest risk management of fruit flies (Tephritidae) should also be included as it is also a systems approach standard. ISPM 35 is mentioned in section 5.1.
700	4.5.88 Other requirements related to pest risk management	P	Category : SUBSTANTIVE (861) COSAVE (12 Sep 2023 9:08 PM)

Additional options		Title changed because these are not options of pest risk management, These are requirements that could be part of a systems approach, but they are not options.	
700	4.5.8 Other requirements related to pest risk management Additional options	P	<i>Category : SUBSTANTIVE (717) Uruguay (7 Sep 2023 9:25 PM)</i> Title changed because these are not options of pest risk management, These are requirements that could be part of a systems approach, but they are not options.
701	Further additional <u>phytosanitary measures requirements</u> may be <u>required needed</u> to provide assurance, verification, oversight, protection against infestation or contamination, or to allow for traceability.	P	<i>Category : TECHNICAL (862) COSAVE (12 Sep 2023 9:09 PM)</i> Text adjusted accordingly to the change proposed for the Title of the section
701	Further additional <u>phytosanitary measures requirements</u> may be <u>required needed</u> to provide assurance, verification, oversight, protection against infestation or contamination, or to allow for traceability.	P	<i>Category : TECHNICAL (718) Uruguay (8 Sep 2023 3:30 PM)</i> Text adjusted accordingly to the change proposed for the Title of the section
703	<u>certification schemes for plants for planting;</u>	P	<i>Category : TECHNICAL (863) COSAVE (12 Sep 2023 9:10 PM)</i> Moved to the section on pre-harvest options
703	<u>certification schemes for plants for planting;</u>	P	<i>Category : TECHNICAL (719) Uruguay (8 Sep 2023 3:32 PM)</i> Moved to the section on pre-harvest options
705	registered or approved packing houses; <u>- registered or approved treatment facilities or sites;</u>	P	<i>Category : SUBSTANTIVE (924) PPPO (17 Sep 2023 1:13 PM)</i> To complement additional options.
706	labelling on plants in commerce, packages and so on (e.g. identifying packing and treatment facility, dates of packing and treatment, production site and field); <u>and</u> ;	P	<i>Category : EDITORIAL (1700) Australia (29 Sep 2023 6:17 AM)</i>
706	labelling on plants in commerce, packages and so on (e.g. identifying packing and treatment facility, dates of packing and treatment, production site and field); <u>and</u> ;	P	<i>Category : EDITORIAL (925) PPPO (17 Sep 2023 1:13 PM)</i> Created by merging other changes together. PPPO included an additional bullet point at the end, hence 'and' needs to be removed.
707	segregation and secure packaging following treatment <u>- registered or approved treatment facilities; and</u> <u>- inclusion of additional declaration on phytosanitary certification.</u>	P	<i>Category : EDITORIAL (1701) Australia (29 Sep 2023 6:18 AM)</i> Acknowledging the list is intended to be examples, however it would be useful to include some other examples that are also often used to improve scope of the 4.5.8, and completeness of examples.

707	segregation and secure packaging following treatment <ins>packaging</ins> .	P	<p><i>Category : TECHNICAL (1561) European Union (27 Sep 2023 6:52 PM)</i></p> <p>Why only following treatment? It could happen following other measures. Suggest to remove it.</p>
707	segregation and secure packaging following treatment <ins>packaging</ins> .	P	<p><i>Category : TECHNICAL (1276) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Why only following treatment? It could happen following other measures. Suggest removing it.</p>
707	segregation and secure packaging following treatment; <ins>and</ins> <ins>- inclusion of additional declaration on phytosanitary certificates</ins> .	P	<p><i>Category : SUBSTANTIVE (926) PPPO (17 Sep 2023 1:13 PM)</i></p> <p>PPPO added an additional bullet point at the end, hence inserted 'and' here.</p> <p>To complement additional options.</p>
710	Import prohibitions may apply to specific commodities, specific origins, specific physiological stages <ins>(e.g. dormant plants)</ins> <ins>(for example plants with leaves)</ins> or only during specific seasons (e.g. during the flight period of an insect).	P	<p><i>Category : TECHNICAL (1562) European Union (27 Sep 2023 6:54 PM)</i></p> <p>Change the example from dormant plants to another stage, as the dormant stage would generally be considered to be less risky.</p>
710	Import prohibitions may apply to specific commodities, specific origins, specific physiological stages <ins>(e.g. dormant plants)</ins> <ins>(for example plants with leaves)</ins> or only during specific seasons (e.g. during the flight period of an insect).	P	<p><i>Category : TECHNICAL (1277) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Change the example from dormant plants to another stage, as the dormant stage would generally be considered to be less risky</p>
710	Import prohibitions may apply to specific commodities, specific origins, specific physiological stages (e.g. dormant plants) or only during specific seasons (e.g. during the flight period of an insect).	C	<p><i>Category : TRANSLATION (864) COSAVE (12 Sep 2023 9:11 PM)</i></p> <p>"origins" should be translated as "orígenes"</p>
710	Import prohibitions may apply to specific commodities, specific origins, specific physiological stages (e.g. dormant plants) or only during specific seasons (e.g. during the flight period of an insect).	C	<p><i>Category : TRANSLATION (721) Uruguay (8 Sep 2023 3:36 PM)</i></p> <p>"origins" should be translated as "orígenes"</p>
712	Measures identified as pest risk management options should be evaluated based on their effectiveness in reducing the probability of introduction and spread of the pest. To be established as phytosanitary measures, measures should not only be effective but also be feasible and have minimal impact to the international movement of commodities and conveyances.	C	<p><i>Category : TRANSLATION (866) COSAVE (12 Sep 2023 9:13 PM)</i></p> <p>"efectiveness" should be translated as "efectividad"</p>
712	Measures identified as pest risk management options should be evaluated based on	P	<p><i>Category : TECHNICAL</i></p>

	<p>their effectiveness in reducing the probability of introduction and spread of the pest. To be established as phytosanitary measures, measures should not only be effective but also be feasible and have minimal impact to the international movement of commodities and conveyances. Pest risk management options should be evaluated based on their effectiveness in reducing the probability of introduction and spread of the pest. To be established as phytosanitary measures, the identified pest risk management options should not only be effective but also be feasible and have minimal impact to the international movement of commodities and conveyances</p>		<p>(865) COSAVE (12 Sep 2023 9:12 PM) For consistency</p>
712	<p>Pest risk management options should be evaluated based on their effectiveness in reducing the probability of introduction and spread of the pest. To be established as phytosanitary measures, the identified pest risk management options should not only be effective but also be feasible and have minimal impact to the international movement of commodities and conveyances. Measures identified as pest risk management options should be evaluated based on their effectiveness in reducing the probability of introduction and spread of the pest. To be established as phytosanitary measures, measures should not only be effective but also be feasible and have minimal impact to the international movement of commodities and conveyances.</p>	P	<p><i>Category : TECHNICAL</i> (724) Uruguay (8 Sep 2023 3:41 PM) For consistency</p>
712	<p>Measures identified as pest risk management options should be evaluated based on their effectiveness in reducing the probability of introduction and spread of the pest. To be established as phytosanitary measures, measures should not only be effective but also be feasible and have minimal impact to the international movement of commodities and conveyances.</p>	C	<p><i>Category : TRANSLATION</i> (722) Uruguay (8 Sep 2023 3:37 PM) "effectiveness" should be translated as "efectividad"</p>
713	<p>5.1 Effectiveness</p>	C	<p><i>Category : TRANSLATION</i> (867) COSAVE (12 Sep 2023 9:14 PM) "effectiveness" should be translated as "efectividad"</p>
713	<p>5.1 Effectiveness</p>	C	<p><i>Category : TRANSLATION</i> (723) Uruguay (8 Sep 2023 3:38 PM) "effectiveness" should be translated as "efectividad"</p>
714	<p>Effectiveness is an expression of the extent to which a given measure reduces pest risk. A description of effectiveness includes the specification of the desired response or end point and a measurement of that response or end point (e.g. mortality)</p>	P	<p><i>Category : TECHNICAL</i> (868) COSAVE (12 Sep 2023 9:15 PM) Deleted because this text refers mainly to treatments and the section is about effectiveness of measures in general</p>
714	<p>Effectiveness is an expression of the extent to which a given measure reduces pest risk. A description of effectiveness includes the specification of the desired</p>	P	<p><i>Category : TECHNICAL</i> (725) Uruguay (8 Sep 2023 3:44 PM)</p>

	response or end point and a measurement of that response or end point (e.g. mortality).		Deleted because this text refers mainly to treatments and the section is about effectiveness of measures in general
715	When appropriate, effectiveness may be expressed in quantitative terms including the usual statistical parameters (e.g. a confidence interval). When such calculation is not possible or not feasible, effectiveness may be expressed in qualitative terms such as "high", "medium" and "low".	C	<i>Category : TRANSLATION (869) COSAVE (12 Sep 2023 9:16 PM)</i> "effectiveness" should be translated as "efectividad"
715	When appropriate, effectiveness may be expressed in quantitative terms including the usual statistical parameters (e.g. a confidence interval). When such calculation is not possible or not feasible, effectiveness may be expressed in qualitative terms such as "high", "medium" and "low".	C	<i>Category : TRANSLATION (726) Uruguay (8 Sep 2023 3:45 PM)</i> "effectiveness" should be translated as "efectividad"
716	Several factors should be considered in determining the required effectiveness of a measure. These include:	C	<i>Category : TRANSLATION (870) COSAVE (12 Sep 2023 9:16 PM)</i> "effectiveness" should be translated as "efectividad"
716	Several factors should be considered in determining the required effectiveness of a measure. These include:	C	<i>Category : TRANSLATION (727) Uruguay (8 Sep 2023 3:46 PM)</i> "effectiveness" should be translated as "efectividad"
719	the nature of the pest risk being addressed;	C	<i>Category : TECHNICAL (1563) European Union (27 Sep 2023 6:55 PM)</i> What is meant by the nature of the pest risk? Needs elaboration.
719	the nature of the pest risk being addressed;	C	<i>Category : TECHNICAL (1278) EPPO (26 Sep 2023 10:55 AM)</i> What is meant by the nature of the pest risk? it needs elaboration.
719	the nature of the pest risk being addressed;	P	<i>Category : TECHNICAL (871) COSAVE (12 Sep 2023 9:19 PM)</i> Deleted because it is not clear the meaning of "nature of the pest risk"
719	the nature of the pest risk being addressed;	P	<i>Category : TECHNICAL (728) Uruguay (8 Sep 2023 3:48 PM)</i> Deleted because it is not clear the meaning of "nature of the pest risk"
719	the nature <u>and level</u> of the pest risk being addressed;	P	<i>Category : TECHNICAL (663) United States of America (7 Sep 2023 4:26 PM)</i> For consistency with the above - measures are consistent with the level of risk.

720	the biology of the pest (or pests) being managed ; and	P	Category : TECHNICAL (872) COSAVE (12 Sep 2023 9:20 PM) This is not referred to pest management but to pest risk management
720	the biology of the pest (or pests) being managed; pests), and	P	Category : TECHNICAL (729) Uruguay (8 Sep 2023 3:49 PM) This is not referred to pest management but to pest risk management
726	Certain measures may not directly affect mortality of the pest. Considerations for their evaluation include the following:	C	Category : EDITORIAL (1564) European Union (27 Sep 2023 6:56 PM) These could be ordered in a more logical way. Suggested order could be: <ul style="list-style-type: none">- Pest free concepts- Surveillance- Inspection- Sampling- Testing- Post harvest processing- Irradiation treatment- Post entry quarantine- Systems approach
726	Certain measures may not directly affect mortality of the pest. Considerations for their evaluation include the following:	C	Category : EDITORIAL (1279) EPPO (26 Sep 2023 10:55 AM) These could be ordered in a more logical way. Suggested order could be: <ul style="list-style-type: none">- Pest free concepts- Surveillance- Inspection- Sampling- Testing- Post harvest processing- Irradiation treatment- Post entry quarantine- Systems approach
726	Certain measures may not directly affect mortality of the pest. Considerations for their evaluation include the following:	P	Category : TECHNICAL (873) COSAVE (12 Sep 2023 9:21 PM) Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
726	Certain measures may not directly affect mortality of the pest. Considerations for their evaluation include the following:	P	Category : TECHNICAL (730) Uruguay (8 Sep 2023 3:52 PM) Deleted because these paragraphs do not

			provide specific guidance in relation to the effectiveness of measures
727	for surveillance and monitoring: appropriate survey methods, intensity of monitoring, ability to detect the pest (see ISPM 6 (<i>Surveillance</i>));	P	<i>Category : TECHNICAL (874) COSAVE (12 Sep 2023 9:22 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
727	for surveillance and monitoring: appropriate survey methods, intensity of monitoring, ability to detect the pest (see ISPM 6 (<i>Surveillance</i>));	P	<i>Category : TECHNICAL (731) Uruguay (8 Sep 2023 3:52 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
728	for pest free concepts: see ISPM 4, ISPM 10 and ISPM 26;	P	<i>Category : TECHNICAL (875) COSAVE (12 Sep 2023 9:22 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
728	for pest free concepts: see ISPM 4, ISPM 10 and ISPM 26;	P	<i>Category : TECHNICAL (732) Uruguay (8 Sep 2023 3:53 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
729	for systems approaches: see ISPM 14 and ISPM 35 (<i>Systems approach for pest risk management of fruit flies (Tephritidae)</i>);	P	<i>Category : TECHNICAL (876) COSAVE (12 Sep 2023 9:23 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
729	for systems approaches: see ISPM 14 and ISPM 35 (<i>Systems approach for pest risk management of fruit flies (Tephritidae)</i>);	P	<i>Category : TECHNICAL (733) Uruguay (8 Sep 2023 3:53 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
730	for post harvest processing and handling: see ISPM 32;	P	<i>Category : TECHNICAL (877) COSAVE (12 Sep 2023 9:23 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
730	for post harvest processing and handling: see ISPM 32;	P	<i>Category : TECHNICAL (734) Uruguay (8 Sep 2023 3:53 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
731	for testing: availability and reliability of test methods, laboratory accreditation, validation of methodology (e.g. ISPM 27 (<i>Diagnostic protocols for regulated</i>	P	<i>Category : TECHNICAL (878) COSAVE (12 Sep 2023 9:24 PM)</i>

	pests));		Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
731	for testing: availability and reliability of test methods; laboratory accreditation; validation of methodology (e.g. ISPM 27 (<i>Diagnostic protocols for regulated pests</i>));	P	<i>Category : TECHNICAL (735) Uruguay (8 Sep 2023 3:53 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
732	for irradiation treatments: see ISPM 18 (<i>Requirements for the use of irradiation as a phytosanitary measure</i>);	P	<i>Category : TECHNICAL (879) COSAVE (12 Sep 2023 9:25 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
732	for irradiation treatments: see ISPM 18 (<i>Requirements for the use of irradiation as a phytosanitary measure</i>);	P	<i>Category : TECHNICAL (736) Uruguay (8 Sep 2023 3:53 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
733	for sampling: level of confidence of the detection of the pest for a given sample size (see ISPM 31 (<i>Methodologies for sampling of consignments</i>));	P	<i>Category : TECHNICAL (880) COSAVE (12 Sep 2023 9:26 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
733	for sampling: level of confidence of the detection of the pest for a given sample size (see ISPM 31 (<i>Methodologies for sampling of consignments</i>));	P	<i>Category : TECHNICAL (737) Uruguay (8 Sep 2023 3:54 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
734	for inspection: ability to detect the pest on the commodity (see ISPM 23); and	P	<i>Category : TECHNICAL (881) COSAVE (12 Sep 2023 9:26 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
734	for inspection: ability to detect the pest on the commodity (see ISPM 23); and	P	<i>Category : TECHNICAL (738) Uruguay (8 Sep 2023 3:54 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
735	for post-entry measures: see ISPM 36.	C	<i>Category : TECHNICAL (1702) Australia (29 Sep 2023 6:19 AM)</i> ISPM 36 is not the most appropriate example for post-entry measures.

735	for post-entry measures: see ISPM 36.	C	<i>Category : SUBSTANTIVE (1115) APPPC (26 Sep 2023 10:36 AM)</i> To add another bullet - for post entry measures: See ISPM 34
735	for <u>post-entry integrated</u> measures: see ISPM 36.	P	<i>Category : EDITORIAL (1114) APPPC (26 Sep 2023 10:36 AM)</i> It should be integrated measures for plant for planting refers to ISPM 36
735	for post-entry measures: see ISPM <u>3636</u> and ISPM 34.	P	<i>Category : SUBSTANTIVE (927) PPPO (17 Sep 2023 1:13 PM)</i> ISPM 34 provides more information on post-entry measures (ISPM 36 is generally focussed on pre-entry measures).
735	for post entry measures: see ISPM 36.	P	<i>Category : TECHNICAL (882) COSAVE (12 Sep 2023 9:26 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
735	for post entry measures: see ISPM 36.	P	<i>Category : TECHNICAL (739) Uruguay (8 Sep 2023 3:54 PM)</i> Deleted because these paragraphs do not provide specific guidance in relation to the effectiveness of measures
736	National plant protection organizations of importing countries may identify more than one pest risk management option, consisting of one or more measures, that could be used by an exporting country.	C	<i>Category : TECHNICAL (1565) European Union (27 Sep 2023 6:57 PM)</i> Relevance here? Maybe better in section 6 'Selection of appropriate phytosanitary measures'.
736	National plant protection organizations of importing countries may identify more than one pest risk management option, consisting of one or more measures, that could be used by an exporting country.	C	<i>Category : TECHNICAL (1280) EPPO (26 Sep 2023 10:55 AM)</i> Relevance here? Maybe better in section 6 'Selection of appropriate phytosanitary measures'
736	National plant protection organizations of importing countries may identify more than one pest risk management option, consisting of one or more <u>measures, that measures which</u> could be used by an exporting country.	P	<i>Category : EDITORIAL (598) Ghana (31 Aug 2023 12:03 AM)</i>
738	The required response or end-point for treatments should be specified, along with the required efficacy, <u>unless use in trade indicates that the treatment is effective</u> . Responses or end-points may include:	P	<i>Category : SUBSTANTIVE (1116) APPPC (26 Sep 2023 10:36 AM)</i>
738	The required response or end-point for treatments should be specified, along with the required <u>efficacy</u> <u>unless the effectiveness has been proven in trade</u> .	P	<i>Category : SUBSTANTIVE (928) PPPO (17 Sep 2023 1:13 PM)</i> For greater clarity and for consistency (some

	Responses or end-points may include:		measures don't have efficacy data, yet are used in trade).
738	The required <u>response or end-point response</u> for treatments should be specified, along with the required efficacy. <u>Responses or end-points Responses</u> may include:	P	Category : TECHNICAL (883) COSAVE (12 Sep 2023 9:27 PM) For consistency with other ISPMs mentioning required response (for example ISPM 18)
738	The required response <u>or end-point</u> for treatments should be specified, along with the required efficacy. Responses <u>or end-points</u> may include:	P	Category : TECHNICAL (740) Uruguay (8 Sep 2023 3:56 PM) For consistency with other ISPMs mentioning required response (for example ISPM 18)
743	altered behaviour. <u>- Probit analysis has been used to establish the efficacy of high-mortality treatments for certain pests. High mortality treatments are typically applied as a single measure to specific commodity-pest combinations</u>	P	Category : TECHNICAL (884) COSAVE (12 Sep 2023 9:28 PM) Text from the draft on pest risk management to provide an introduction to the following text on high-mortality treatments
743	altered behaviour. <u>Probit analysis has been used to establish the efficacy of high-mortality treatments for certain pests. High mortality treatments are typically applied as a single measure to specific commodity-pest combinations</u>	P	Category : TECHNICAL (741) Uruguay (8 Sep 2023 4:07 PM) Text from the draft on pest risk management to provide an introduction to the following text on high-mortality treatments
744	High-mortality treatments may not be feasible <u>or technically justified</u> when, for example:	C	Category : TECHNICAL (1566) European Union (27 Sep 2023 6:58 PM) Not understood. Is this technical justification linked to the appropriate level of protection?
744	High-mortality treatments may not be feasible <u>or technically justified</u> when, for example:	C	Category : TECHNICAL (1281) EPPO (26 Sep 2023 10:55 AM) Not understood is this technical justification linked to the appropriate level of protection?
745	<u>the testing required to establish high mortality efficacy is not possible based on the pest biology (e.g. some organisms are difficult to rear in large enough numbers to establish the required statistical measures) but lower mortality rates can be established or lower statistical confidence can be achieved; or</u>	P	Category : TECHNICAL (1703) Australia (29 Sep 2023 6:20 AM) This dash point appears to mix 2 aspects, mortality rate and level of statistical confidence. Text in the bracket confuses this further. Suggest deletion of this dash point or provide clearer description to improve clarity of the points and technical accuracy.
746	the commodity is only tolerant to the treatment at lower efficacies (e.g. a commodity that does not tolerate a cold treatment that achieves a high mortality rate may tolerate a cold treatment at a slightly higher temperature	C	Category : TECHNICAL (1568) European Union (27 Sep 2023 7:00 PM)

	or shorter duration but which achieves a lower mortality rate).		Consider a temperature treatment (hold or cold) which causes high pest mortality (probit 9 level) but also damages the commodity. Selecting a less severe treatment that does not damage the commodity but still causes some mortality may be appropriate but, because it has lower efficacy, another treatment is also required (i.e. a systems approach is taken). Thus the consequence is that an additional management option may also need to be put in place to achieve the appropriate level of protection. This then links with para 747.
746	the commodity is only tolerant to the treatment at lower efficacies (e.g. a commodity that does not tolerate a cold treatment that achieves a high mortality rate may tolerate a cold treatment at a slightly higher temperature or shorter duration but which achieves a lower mortality rate).	C	<p><i>Category : TECHNICAL (1567) European Union (27 Sep 2023 6:59 PM)</i></p> <p>But does it achieve the appropriate level of protection? We do not understand what the consequence of the sentence is.</p>
746	the commodity is only tolerant to the treatment at lower efficacies (e.g. a commodity that does not tolerate a cold treatment that achieves a high mortality rate may tolerate a cold treatment at a slightly higher temperature or shorter duration but which achieves a lower mortality rate).	C	<p><i>Category : TECHNICAL (1283) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Consider a temperature treatment (hold or cold) which causes high pest mortality (probit 9 level) but also damages the commodity. Selecting a less severe treatment that does not damage the commodity but still causes some mortality may be appropriate but, because it has lower efficacy, another treatment is also required (i.e. a systems approach is taken). Thus the consequence is that an additional management option may also need to be put in place to achieve the appropriate level of protection. This then links with para 747.</p>
746	the commodity is only tolerant to the treatment at lower efficacies (e.g. a commodity that does not tolerate a cold treatment that achieves a high mortality rate may tolerate a cold treatment at a slightly higher temperature or shorter duration but which achieves a lower mortality rate).	C	<p><i>Category : TECHNICAL (1282) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>But does it achieve the appropriate level of protection? We do not understand what the consequence of the sentence is.</p>
747	Alternative treatments may be considered when high-mortality treatments are either not available or not feasible. A combination of lower-mortality treatments may be as effective as a single high-mortality treatment.	C	<p><i>Category : TECHNICAL (1569) European Union (27 Sep 2023 7:01 PM)</i></p> <p>Do you want to refer to systems approach here?</p>

747	Alternative treatments may be considered when high-mortality treatments are either not available or not feasible. A combination of lower-mortality treatments may be as effective as a single high-mortality treatment.	C	<i>Category : TECHNICAL (1284) EPPO (26 Sep 2023 10:55 AM)</i> Do you want to refer to systems approach here?
748	5.3 Potential impact of the measure	C	<i>Category : SUBSTANTIVE (1570) European Union (27 Sep 2023 7:02 PM)</i> Is this a new concept that the PRA should consider these "impacts in the exporting countries"? How easy is it to consider the social and environmental impact in the exporting countries? Is it not to the exporting country to react during e.g. the notification period to WTO and propose equivalent measures?
748	5.3 Potential impact of the measure	C	<i>Category : SUBSTANTIVE (1285) EPPO (26 Sep 2023 10:55 AM)</i> Is this a new concept that the PRA should consider these "impacts in the exporting countries"? How easy is it to consider the social and environmental impact in the exporting countries? Is it not to the exporting country to react during e.g. the notification period to WTO and propose equivalent measures?
749	The potential economic, social and environmental impacts of measures should be identified and considered when evaluating them as pest risk management options. The NPPO of an importing country should discuss these with the NPPOs of exporting countries.	C	<i>Category : TRANSLATION (885) COSAVE (12 Sep 2023 9:30 PM)</i> "economic" should be translated into Spanish as "económicas"
749	The potential economic, social and environmental impacts of measures should be identified and considered when evaluating them as pest risk management options. The NPPO of an importing country should discuss these with the NPPOs of exporting countries.	C	<i>Category : TRANSLATION (742) Uruguay (8 Sep 2023 4:10 PM)</i> "economic" should be translated into Spanish as "económicas"
755	5.4 Uncertainty	C	<i>Category : SUBSTANTIVE (1572) European Union (27 Sep 2023 7:04 PM)</i> During the EWG, several tables were discussed and included in the draft. Perhaps it would be interesting to discuss whether they could be included as a proposal for implementation material.

755	5.4 Uncertainty	C	<p>Category : SUBSTANTIVE (1571) European Union (27 Sep 2023 7:03 PM) Suggest that this is combined with the uncertainty section in the main body of the standard. This is generic and applies to all parts of the PRA process.</p>
755	5.4 Uncertainty	C	<p>Category : SUBSTANTIVE (1287) EPPO (26 Sep 2023 10:55 AM) During the EWG, several tables were discussed and included in the draft. Perhaps it would be interesting to discuss whether they could be included as a proposal for implementation material.</p>
755	5.4 Uncertainty	C	<p>Category : SUBSTANTIVE (1286) EPPO (26 Sep 2023 10:55 AM) Suggest that this is combined with the uncertainty section in the main body of the standard. This is generic and applies to all parts of the PRA process.</p>
756	Pest risk management options may be difficult to evaluate if significant uncertainty is identified in the pest risk assessment. <u>Even where uncertainty is identified, phytosanitary measures should not be applied unless information indicates that the pest risk is unacceptable.</u>	P	<p>Category : SUBSTANTIVE (1573) European Union (27 Sep 2023 7:05 PM) Generally yes, but there may be cases where a precautionary approach would be needed. The second sentence is not correct. Please see our following comment.</p>
756	Pest risk management options may be difficult to evaluate if significant uncertainty is identified in the pest risk assessment. <u>Even where uncertainty is identified, phytosanitary measures should not be applied unless information indicates that the pest risk is unacceptable.</u>	P	<p>Category : SUBSTANTIVE (1288) EPPO (26 Sep 2023 10:55 AM) Generally yes, but there may be cases where a precautionary approach would be needed. The second sentence is not correct. Please see our following comment.</p>
756	Pest risk management options may be difficult to evaluate if significant uncertainty is identified in the pest risk assessment. <u>Even where uncertainty is identified, phytosanitary measures should not be applied unless information indicates that the pest risk is unacceptable.</u>	P	<p>Category : EDITORIAL (929) PPPO (17 Sep 2023 1:13 PM) PPPO believes this is repetitious and confusing; adds more uncertainty.</p>
756	Pest risk management options may be difficult to evaluate if significant uncertainty is identified in the pest risk assessment. <u>Even where uncertainty is identified, phytosanitary Phytosanitary</u> measures should not be <u>applied required</u> unless information indicates that the pest risk is unacceptable.	P	<p>Category : TECHNICAL (778) Brazil (8 Sep 2023 8:12 PM) To provide clarity, once it was contradictory with the next paragraph ("[...] may be technically justifiable to require PM to compensate for uncertainty.")</p>

757	<p><u>Uncertainty may be addressed by adjusting the strength of Where uncertainty is identified, phytosanitary measures or deeming them redundant. While measures should not be appropriate to applied unless information indicates that the pest risk is unacceptable. However, in certain cases it may be technically justifiable to require phytosanitary measures to compensate for uncertainty or to take precautions.</u> In those cases, the uncertainty should be identified (in terms of the source of uncertainty and the degree of uncertainty) and, if possible, addressed. Phytosanitary measures should subsequently be adjusted once uncertainty has been reduced.</p>	P	<p>Category : TECHNICAL (1574) European Union (27 Sep 2023 7:08 PM) This paragraph is not clear and not well structured. We have proposed rewording.</p>
757	<p><u>Uncertainty may be addressed by adjusting the strength of Where uncertainty is identified, phytosanitary measures or deeming them redundant. While measures should not be appropriate to applied unless information indicates that the pest risk is unacceptable. However, in certain cases it may be technically justifiable to require phytosanitary measures to compensate for uncertainty or to take precautions.</u> In those cases, the uncertainty should be identified (in terms of the source of uncertainty and the degree of uncertainty) and, if possible, addressed. Phytosanitary measures should subsequently be adjusted once uncertainty has been reduced.</p>	P	<p>Category : TECHNICAL (1289) EPPO (26 Sep 2023 10:55 AM) This paragraph is not clear and not well structured. We have proposed rewording.</p>
757	<p><u>Uncertainty may be addressed by adjusting the strength of measures or deeming them redundant. While measures should be appropriate to the pest risk, it may be technically justifiable to require phytosanitary measures to compensate for uncertainty. In those cases, the uncertainty should be identified (in terms of the source of uncertainty and the degree of uncertainty) and, if possible, addressed. Phytosanitary measures should subsequently be adjusted once uncertainty has been reduced.</u></p>	P	<p>Category : EDITORIAL (930) PPPO (17 Sep 2023 1:13 PM) PPPO believes this is repetitious and confusing; adds more uncertainty.</p>
757	<p>Uncertainty may be addressed by adjusting the strength of measures or deeming them redundant. While <u>phytosanitary</u> measures should be appropriate to the pest risk, <u>it</u><u>they</u> may be technically justifiable to <u>require phytosanitary measures to</u> compensate for uncertainty. In those cases, the uncertainty should be identified (in terms of the source of uncertainty and the degree of uncertainty) and, if possible, addressed. Phytosanitary measures should subsequently be adjusted once uncertainty has been reduced.</p>	P	<p>Category : TECHNICAL (779) Brazil (8 Sep 2023 8:26 PM) To simplify and provide clarity</p>
758	<p>Provisional measures may be implemented when there is uncertainty, but their application should be reviewed <u>in a timely manner as soon as possible</u> to provide</p>	P	<p>Category : TECHNICAL (1038) Japan (22 Sep 2023 6:29 AM) For consistency with the definition of</p>

	technical justification for their continuance or removal.		"provisional measure" in ISPM5.
758	Provisional measures-measures , which may be stronger than needed , may be implemented when there is uncertainty, but their application should be reviewed in a timely manner to provide technical justification for their continuance or removal. <u>Prohibition may be considered an option where there is too much uncertainty.</u>	P	<i>Category : SUBSTANTIVE (931) PPPO (17 Sep 2023 1:13 PM)</i> For clarity. There is a section on prohibition and this can be employed if needed.
760	In addition to being technically justified and effective, pest risk management options selected as phytosanitary measures should also be feasible.	P	<i>Category : SUBSTANTIVE (1575) European Union (27 Sep 2023 7:10 PM)</i> We are just selecting pest risk management options at this stage. Selection of measures is in the next section.
760	In addition to being technically justified and effective, pest risk management options selected as phytosanitary measures-options should also be feasible.	P	<i>Category : SUBSTANTIVE (1290) EPPO (26 Sep 2023 10:55 AM)</i> We are just selecting pest risk management options at this stage. Selection of measures is in the next section.
761	The NPPO of the importing country should identify any available measures that could prevent the introduction of the pest. These should be considered for their feasibility in the exporting country or countries <ins>countries or in the importing country itself</ins> .	P	<i>Category : TECHNICAL (769) Brazil (8 Sep 2023 7:26 PM)</i> some measures can be applied in the importing country (e.g. quarantine)
763	negative effects of treatments measures on the commodity (e.g. phytotoxicity, physical damage, reduction in shelf life);	P	<i>Category : TECHNICAL (886) COSAVE (12 Sep 2023 9:30 PM)</i> Treatments are one of the options of measures
763	negative effects of treatments measures on the commodity (e.g. phytotoxicity, physical damage, reduction in shelf life);	P	<i>Category : TECHNICAL (743) Uruguay (8 Sep 2023 4:12 PM)</i> Treatments are one of the options of measures
764	negative economic, social and environmental impacts resulting from the application of the measure;	C	<i>Category : TECHNICAL (1576) European Union (27 Sep 2023 7:10 PM)</i> Impact, so better placed in section 5.3.
764	negative economic, social and environmental impacts resulting from the application of the measure;	C	<i>Category : TECHNICAL (1291) EPPO (26 Sep 2023 10:55 AM)</i> Impact, so better placed in section 5.3
770	Once potential pest risk management options have been identified and evaluated based on effectiveness, feasibility-impacts and impactsfeasibility , specific phytosanitary measures may be selected from these options.	P	<i>Category : EDITORIAL (1577) European Union (27 Sep 2023 7:13 PM)</i> Reordered to match the ordering of the

			sections.
770	Once potential pest risk management options have been identified and evaluated based on effectiveness, <u>feasibility impacts</u> and <u>impacts feasibility</u> , specific phytosanitary measures may be selected from these options.	P	<i>Category : EDITORIAL (1292) EPPO (26 Sep 2023 10:55 AM)</i> Reordered to match the ordering of the sections
770	Once potential pest risk management options have been identified and evaluated based on effectiveness, feasibility and impacts, <u>the NPPO of the importing country</u> <u>may select</u> specific phytosanitary measures <u>may be selected from among</u> these options.	P	<i>Category : TECHNICAL (770) Brazil (8 Sep 2023 7:42 PM)</i> For consistency with other parts of the draft.
771	<u>Exporting countries should have the opportunity to provide proposals on phytosanitary measures to importing countries.</u>	P	<i>Category : SUBSTANTIVE (1578) European Union (27 Sep 2023 7:14 PM)</i> More logical to place this sentence after paragraph 774, since it also concerns the exporting country (see our comment on paragraph 774).
771	<u>Exporting countries should have the opportunity to provide proposals on phytosanitary measures to importing countries.</u>	P	<i>Category : TECHNICAL (1293) EPPO (26 Sep 2023 10:55 AM)</i> More logical to place this sentence after paragraph 774, since it also concerns the exporting country (see our comment on paragraph 774).
771	<u>Exporting countries should have the opportunity to provide proposals on phytosanitary measures to importing countries.</u>	P	<i>Category : EDITORIAL (887) COSAVE (12 Sep 2023 9:31 PM)</i> Moved to last paragraph
771	<u>Exporting countries</u> <u>The NPPO of the exporting country</u> should have the opportunity to <u>provide discuss</u> proposals <u>on of</u> phytosanitary measures <u>to with the NPPO of the</u> <u>importing countries</u> <u>country</u> .	P	<i>Category : TECHNICAL (772) Brazil (8 Sep 2023 7:46 PM)</i> 1. For consistency with other parts of the draft. 2. Once the importing country selects PM, the exporting country may discuss them and propose other measures.
771	<u>Exporting countries should have the opportunity to provide proposals on phytosanitary measures to importing countries.</u>	P	<i>Category : EDITORIAL (745) Uruguay (8 Sep 2023 4:16 PM)</i> Moved to last paragraph
772	Depending on the effectiveness of the measures, <u>and the appropriate level of protection</u> , one or more phytosanitary measures may be selected.	P	<i>Category : TECHNICAL (888) COSAVE (12 Sep 2023 9:32 PM)</i> For simplification and better reading
772	Depending on the effectiveness of the measures, <u>and the appropriate level of protection</u> , one or more phytosanitary measures may be selected.	P	<i>Category : TECHNICAL (746) Uruguay (8 Sep 2023 4:17 PM)</i> For simplification and better reading
773	<u>A cA</u> phytosanitary measure that is effective against one quarantine pest may also be effective against other quarantine pests. Therefore, a single phytosanitary	P	<i>Category : EDITORIAL (1095) Eswatini (26 Sep 2023 9:06 AM)</i>

	measure <u>can</u> may mitigate the pest risk for multiple quarantine pests.		
773	A phytosanitary measure that is effective against one-a quarantine pest may also be effective against other quarantine pests. Therefore, a single phytosanitary measure may mitigate the pest risk for multiple quarantine pests.	P	<i>Category : EDITORIAL (773) Brazil (8 Sep 2023 7:52 PM)</i> indefinite article, instead of numeral
774	If the NPPO of the importing country or countries identifies more than one appropriate phytosanitary measure to manage the pest risk, all these phytosanitary measures should be considered equivalent and published as options in the country's phytosanitary import requirements or shared with the NPPOs of exporting countries. <u>Exporting countries should have the opportunity to provide proposals on phytosanitary measures to importing countries.</u>	P	<i>Category : SUBSTANTIVE (1579) European Union (27 Sep 2023 7:14 PM)</i> More logical to place this sentence from paragraph 771 after paragraph 774, since it also concerns the exporting country.
774	If the NPPO of the importing country or countries identifies more than one appropriate phytosanitary measure to manage the pest risk, all these phytosanitary measures should be considered equivalent and published as options in the country's phytosanitary import requirements or shared with the NPPOs of exporting countries. <u>Exporting countries should have the opportunity to provide proposals on phytosanitary measures to importing countries.</u>	P	<i>Category : TECHNICAL (1294) EPPO (26 Sep 2023 10:55 AM)</i> More logical to place this sentence from paragraph 771 after paragraph 774, since it also concerns the exporting country.
774	If the NPPO of the importing country or countries identifies more than one appropriate phytosanitary measure to manage the pest risk, all these phytosanitary measures should be considered equivalent and published as options in the country's phytosanitary import requirements or shared with the NPPOs-NPPO of the exporting countries country.	P	<i>Category : EDITORIAL (774) Brazil (8 Sep 2023 7:55 PM)</i> For consistency
775	The NPPO of an exporting country should identify its preferred phytosanitary measure or measures to minimize impacts. <u>Exporting countries should have the opportunity to provide proposals on equivalent phytosanitary measures to importing countries</u>	P	<i>Category : EDITORIAL (889) COSAVE (12 Sep 2023 9:33 PM)</i> For better reading
775	The NPPO of an exporting country should identify its preferred phytosanitary measure or measures to minimize impacts. <u>Exporting countries should have the</u>	P	<i>Category : EDITORIAL (747) Uruguay (8 Sep 2023 4:18 PM)</i> For better reading

	<u>opportunity to provide proposals on equivalent phytosanitary measures to importing countries</u>		
777	The pest risk management process concludes either with the determination that there are no appropriate pest risk management options or with the selection of one or more pest risk management options that would lower the pest risk to <u>a level deemed acceptable</u> <u>an acceptable level</u> .	P	<i>Category : TECHNICAL (1580) European Union (27 Sep 2023 7:15 PM)</i> Improved drafting.
777	The pest risk management process concludes either with the determination that there are no appropriate pest risk management options or with the selection of one or more pest risk management options that would lower the pest risk to <u>a level deemed acceptable</u> <u>an acceptable level</u> .	P	<i>Category : TECHNICAL (1295) EPPO (26 Sep 2023 10:55 AM)</i> Improved drafting.
778	The selected pest risk management options may form the basis of phytosanitary regulations or phytosanitary import requirements for the regulated area .	C	<i>Category : EDITORIAL (1676) South Africa (28 Sep 2023 12:51 PM)</i> "regulated area" erroneously bolded
778	The selected pest risk management options may form the basis of phytosanitary regulations or phytosanitary import requirements for the <u>regulated area</u> <u>regulated area</u> .	P	<i>Category : EDITORIAL (1581) European Union (27 Sep 2023 7:16 PM)</i> Typo: not in bold.
778	The selected pest risk management options may form the basis of phytosanitary regulations or phytosanitary import requirements for the <u>regulated area</u> <u>regulated area</u> .	P	<i>Category : EDITORIAL (1296) EPPO (26 Sep 2023 10:55 AM)</i> Typo: not in bold.
778	The selected pest risk management options may form the basis of phytosanitary regulations or phytosanitary import requirements for the regulated area .	C	<i>Category : EDITORIAL (890) COSAVE (12 Sep 2023 9:34 PM)</i> regulated area should be unbolded
778	The selected pest risk management options may form the basis of phytosanitary regulations or phytosanitary import requirements for the regulated area .	C	<i>Category : EDITORIAL (748) Uruguay (8 Sep 2023 4:18 PM)</i> regulated area should be unbolded
779	8. Documentation and communication	C	<i>Category : TECHNICAL (1582) European Union (27 Sep 2023 7:17 PM)</i> Suggest that this section is combined with the documentation section in the main body of the standard. Documentation and communication is generic and relevant to all stages of the PRA process.
779	8. Documentation and communication	C	<i>Category : TECHNICAL (1297) EPPO (26 Sep 2023 10:55 AM)</i> Suggest that this section is combined with the documentation section in the main body of the standard. Documentation and

			communication is generic and relevant to all stages of the PRA process.
784	the justification for selecting these, and not other, measures.	C	<p>Category : SUBSTANTIVE (1583) European Union (27 Sep 2023 7:17 PM)</p> <p>This last point may be controversial and difficult to put in practice, and there is not always more than one option to select.</p>
784	the justification for selecting these, and not other, measures.	C	<p>Category : TECHNICAL (1298) EPPO (26 Sep 2023 10:55 AM)</p> <p>This last point may be controversial and difficult to put in practice, and there is not always more than one option to select.</p>
785	<p><u>The NPPO of the importing country should be open to consultation regarding phytosanitary measures when requested and should allow the NPPO of the exporting country a reasonable time frame for submitting comments. Contracting parties should be open to consultation regarding phytosanitary measures when requested and should allow the exporting country or countries a reasonable time frame for submitting comments.</u></p>	P	<p>Category : EDITORIAL (775) Brazil (8 Sep 2023 8:00 PM)</p> <p>For consistency</p>
788	the NPPO of <u>an</u> <u>the</u> exporting country proposes equivalent measures for evaluation by the NPPO of the importing country according to ISPM 24 (<i>Guidelines for the determination and recognition of equivalence of phytosanitary measures</i>);	P	<p>Category : EDITORIAL (776) Brazil (8 Sep 2023 8:03 PM)</p> <p>For consistency</p>
801	ANNEX 4: Environmental risks	C	<p>Category : TECHNICAL (1704) Australia (29 Sep 2023 6:21 AM)</p> <p>The purpose of this Annex and how helpful it is in conducting a risk assessment is not clear. Is it still intended to be an extension/supplement of the consequence assessment section 4 Annex 2, as this was the intention for it in the current ISPM 11, or is it to be considered on its own. Suggest further clarity around purpose of this annex, for example it provides additional guidance to annex 2 section 4.2.4 in assessing environmental risk.</p>
801	ANNEX 4: Environmental risks	C	<p>Category : TECHNICAL (891) COSAVE (12 Sep 2023 9:34 PM)</p> <p>As per general comment we suggest to integrate this Annex to the core text and Annexes as it corresponds</p>

801	ANNEX 4: Environmental risks	C	Category : TECHNICAL (750) Uruguay (8 Sep 2023 4:24 PM) As per general comment we suggest to integrate this Annex to the core text and Annexes as it corresponds
801	<u>ANNEX ANNEXE 4: Environmental risks 4 : Risques environnementaux</u>	P	Category : TECHNICAL (612) Burkina Faso (5 Sep 2023 10:27 AM) Le risque environnemental doit prendre en compte l'impact indirecte de certains organismes nuisible comme agent vecteur
801	ANNEX 4: Environmental risks	C	(306) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 6:04 PM] Red - The texts in Annex4 are from ISPM11. Some parts are editorially changed
803	1. Introduction	C	Category : TECHNICAL (892) COSAVE (12 Sep 2023 9:35 PM) We suggest to revise this section to avoid repetition. For example first paragraph repeats information contained in the core text
803	1. Introduction	C	Category : TECHNICAL (749) Uruguay (8 Sep 2023 4:23 PM) We suggest to revise this section to avoid repetition. For example first paragraph repeats information contained in the core text
804	The range of pests covered by the IPPC extends beyond pests directly affecting cultivated plants. The coverage of the IPPC definition of “pests” includes plants as pests and other species that have indirect effects on plants, and the convention applies to the protection of wild flora. The scope of the IPPC also extends to organisms that are pests because they fall into one or more of the following categories:	C	Category : EDITORIAL (1584) European Union (27 Sep 2023 7:18 PM) The first sentence repeats what is in paragraph 171. Is this repetition necessary? We suggest to remove it.
804	The range of pests covered by the IPPC extends beyond pests directly affecting cultivated plants. The coverage of the IPPC definition of “pests” includes plants as pests and other species that have indirect effects on plants, and the convention applies to the protection of wild flora. The scope of the IPPC also extends to organisms that are pests because they fall into one or more of the following categories:	C	Category : EDITORIAL (1299) EPPO (26 Sep 2023 10:55 AM) The first sentence repeats what is in paragraph 171. Is this repetition necessary? We suggest to remove it.

805	<p><i>They directly affect uncultivated or unmanaged plants.</i> Introduction of these pests may have few commercial consequences, and therefore they have been less likely to have been evaluated, regulated or placed under official control. An example of this type of pest is Dutch elm disease (caused by <i>Ophiostoma novo-ulmi</i> Brasier, 1991).</p>	C	<p>Category : EDITORIAL (1586) European Union (27 Sep 2023 7:21 PM) Consistency with the term "wild".</p>
805	<p><i>They directly affect uncultivated or unmanaged plants.</i> Introduction of these pests may have few commercial consequences, and therefore they have been less likely to have been evaluated, regulated or placed under official control. An example of this type of pest is Dutch elm disease (caused by <i>Ophiostoma novo-ulmi</i> Brasier, 1991).</p>	P	<p>Category : SUBSTANTIVE (1585) European Union (27 Sep 2023 7:19 PM) Examples using species names are not provided elsewhere and elm trees are cultivated and can be managed. Moreover this fungus is regulated as a quarantine pest in China and Canada, and also the APPPC has categorized it as a quarantine pest. We suggest to remove the example.</p>
805	<p><i>They directly affect uncultivated or unmanaged plants.</i> Introduction of these pests may have few commercial consequences, and therefore they have been less likely to have been evaluated, regulated or placed under official control. An example of this type of pest is Dutch elm disease (caused by <i>Ophiostoma novo-ulmi</i> Brasier, 1991).</p>	C	<p>Category : EDITORIAL (1301) EPPO (26 Sep 2023 10:55 AM) Consistency with the term "wild"</p>
805	<p><i>They directly affect uncultivated or unmanaged plants.</i> Introduction of these pests may have few commercial consequences, and therefore they have been less likely to have been evaluated, regulated or placed under official control. An example of this type of pest is Dutch elm disease (caused by <i>Ophiostoma novo-ulmi</i> Brasier, 1991).</p>	P	<p>Category : SUBSTANTIVE (1300) EPPO (26 Sep 2023 10:55 AM) Examples using species names are not provided elsewhere and elm trees are cultivated and can be managed. Moreover this fungus is regulated as a quarantine pest in China and Canada, and also the APPPC has categorized it as a quarantine pest. We suggest to remove the example.</p>
806	<p><i>They indirectly affect plants.</i> In addition to pests that directly affect host plants, there are those that affect plants primarily by other processes such as competition. Examples include most plants as pests (e.g. weeds, (for example non-indigenous plants-weeds that establish or spread rapidly).</p>	P	<p>Category : TECHNICAL (1587) European Union (27 Sep 2023 7:22 PM) 1) Improved drafting 2) Suggest removing plants as an example, as they may not be inherently negative</p>
806	<p><i>They indirectly affect plants.</i> In addition to pests that directly affect host plants, there are those that affect plants primarily by other processes such as competition. Examples include most plants as pests (e.g. weeds, non-indigenous plants-(for example weeds that establish or spread rapidly).</p>	P	<p>Category : TECHNICAL (1302) EPPO (26 Sep 2023 10:55 AM) 1) Improved drafting 2) Suggest removing non-indigenous plants as an example, as they may not be inherently negative</p>

808	To protect the environment and biodiversity without creating disguised barriers to trade, environmental risks, including risks to biological diversity, should be analysed in a PRA.	C	<p><i>Category : SUBSTANTIVE (1589) European Union (27 Sep 2023 7:26 PM)</i></p> <p>Delete this paragraph because PRA does not deal with all environmental risks, but only with risks affecting plants?</p> <p>Anyway, PRA is about the analysis of the pest risks including environmental risks and risks to biodiversity, so this paragraph is not necessary.</p>
808	To protect the environment and biodiversity without creating disguised barriers to trade, environmental risks, including risks to biological diversity, should be analysed in a PRA.	C	<p><i>Category : SUBSTANTIVE (1588) European Union (27 Sep 2023 7:23 PM)</i></p> <p>Delete this paragraph because PRA does not deal with all environmental risks, but only with risks affecting plants?</p> <p>Anyway, PRA is about the analysis of the pest risks including environmental risks and risks to biodiversity, so this paragraph is not necessary.</p>
808	To protect the environment and biodiversity without creating disguised barriers to trade, environmental risks, including risks to biological diversity, should be analysed in a PRA.	C	<p><i>Category : SUBSTANTIVE (1303) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Delete this paragraph because PRA does not deal with all environmental risks, but only with risks affecting plants?</p> <p>Anyway, PRA is about the analysis of the pest risks including environmental risks and risks to biodiversity, so this paragraph is not necessary.</p>
809	2. Sources of information	C	<p><i>Category : TECHNICAL (1591) European Union (27 Sep 2023 7:29 PM)</i></p> <p>This is generic. Is it better to combine with the main body of the standard?</p>
809	2. Sources of information	C	<p><i>Category : SUBSTANTIVE (1590) European Union (27 Sep 2023 7:28 PM)</i></p> <p>It is not true that NPPOs traditionally do not use environmental risk information sources. Environmental impact data as well as climate and social impact data are sought and used by NPPOs. This point 2 could be</p>

			deleted.
809	2. Sources of information	C	<p><i>Category : SUBSTANTIVE (1305) EPPO (26 Sep 2023 10:55 AM)</i> It is not true that NPPOs traditionally do not use environmental risk information sources. Environmental impact data as well as climate and social impact data are sought and used by NPPOs. This point 2 could be deleted.</p>
809	2. Sources of information	C	<p><i>Category : TECHNICAL (1304) EPPO (26 Sep 2023 10:55 AM)</i> This is generic, is it better to combine with the main body of the standard?</p>
812	<u>In the case of special areas, such as environmentally protected areas, pest control measures can be discussed with area management entities, although the final decision and responsibility remains with the NPPO as recognized in Supplement 1 (Official control of pests posing an environmental risk may involve agencies other than the NPPO. However, it is recognized that Supplement 1 (Guidelines on the interpretation and application of the concepts of “official control” and “not widely distributed”) to ISPM 5 applies, and in particular its provisions regarding NPPO authority and involvement in official control.</u>	P	<p><i>Category : TECHNICAL (1593) European Union (27 Sep 2023 7:32 PM)</i> Improved drafting.</p>
812	<u>Official control of pests posing an environmental risk may involve agencies other than the NPPO. However, it is recognized that Supplement 1 (Guidelines on the interpretation and application of the concepts of “official control” and “not widely distributed”Guidelines on the interpretation and application of the concepts of “official control” and “not widely distributed”) to ISPM 5 applies, and in particular its provisions regarding NPPO authority and involvement in official control.</u>	P	<p><i>Category : EDITORIAL (1592) European Union (27 Sep 2023 7:30 PM)</i> Italics.</p>
812	<u>In the case of special areas, such as environmentally protected areas, pest control measures can be discussed with area management entities, although the final decision and responsibility remains with the NPPO as recognized in Supplement 1 (Official control of pests posing an environmental risk may involve agencies other than the NPPO. However, it is recognized that Supplement 1 (Guidelines on the interpretation and application of the concepts of “official control” and “not widely distributed”Guidelines on the interpretation and application of the concepts of “official control” and “not widely distributed”) to ISPM 5 applies, and in particular its provisions regarding NPPO authority and involvement in official</u>	P	<p><i>Category : TECHNICAL (1306) EPPO (26 Sep 2023 10:55 AM)</i> Italics Improved drafting</p>

	control.		
822	<u>significant effects on ecosystem services including:</u> - significant change in ecological processes and the structure, stability or processes of an ecosystem (including further effects on plant species, increased erosion, water-table changes, increased risk of fire, changes to nutrient cycling);	P	<p><i>Category : TECHNICAL (1594) European Union (27 Sep 2023 7:36 PM)</i></p> <p>Ecosystem services should be mentioned concretely.</p>
822	<u>significant effects on ecosystem services including</u> significant change in ecological processes and the structure, stability or processes of an ecosystem (including further effects on plant species, increased erosion, water-table changes, increased risk of fire, changes to nutrient cycling);	P	<p><i>Category : TECHNICAL (1307) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Ecosystem services should be mentioned concretely</p>
823	effects on human use of plant communities and the environment (e.g. effects on water quality, recreational uses, tourism, animal grazing, hunting, fishing); and	C	<p><i>Category : SUBSTANTIVE (1595) European Union (27 Sep 2023 7:37 PM)</i></p> <p>The consequences of pest introduction can broadly be divided into three categories, economic, environmental and social (see paragraphs 20, 497). Social impacts are not well elaborated in the current draft standard and here, under the section entitled "4. Environmental consequences of pest effects" we see examples of social impact (recreational use and tourism; although one could argue that tourism is an indirect economic impact).</p> <p>We suggest that some extra text is needed to draw attention to the potential for pest effects (or pest management effects) on the environment leading to social impacts.</p>
823	effects on human use of plant communities and the environment (e.g. effects on water quality, recreational uses, tourism, animal grazing, hunting, fishing); and	C	<p><i>Category : SUBSTANTIVE (1308) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>The consequences of pest introduction can broadly be divided into three categories, economic, environmental and social (see paragraphs 20, 497). Social impacts are not well elaborated in the current draft standard and here, under the section entitled "4. Environmental consequences of pest effects" we see examples of social impact (recreational use and tourism; although one could argue that tourism is an indirect economic impact).</p> <p>We suggest that some extra text is needed</p>

			to draw attention to the potential for pest effects (or pest management effects) on the environment leading to social impacts.
825	5. Uncertainty	C	<p><i>Category : TECHNICAL (1596) European Union (27 Sep 2023 7:38 PM)</i></p> <p>This is generic. Is it better to combine with the main body of the standard?</p>
825	5. Uncertainty	C	<p><i>Category : TECHNICAL (1309) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>This is generic, is it better to combine with the main body of the standard?</p>
826	<p>It should be noted that the assessment of the probability of introduction and spread and of environmental consequences of pests of uncultivated and unmanaged plants often involves greater uncertainty than for pests of cultivated or managed plants. This is because of the lack of information, the greater complexity associated with <u>uncultivated</u> ecosystems, and the greater variability associated with pests, hosts or habitats of uncultivated and unmanaged plants.</p>	P	<p><i>Category : SUBSTANTIVE (1597) European Union (27 Sep 2023 7:39 PM)</i></p> <p>Use of the word "ecosystem" here implies that cultivated or managed plants do not exist in ecosystems. This is not correct. An adjective or qualifying term is needed before "ecosystem".</p>
826	<p>It should be noted that the assessment of the probability of introduction and spread and of environmental consequences of pests of uncultivated and unmanaged plants often involves greater uncertainty than for pests of cultivated or managed plants. This is because of the lack of information, the greater complexity associated with <u>uncultivated</u> ecosystems, and the greater variability associated with pests, hosts or habitats of uncultivated and unmanaged plants.</p>	P	<p><i>Category : SUBSTANTIVE (1310) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Use of the word "ecosystem" here implies that cultivated or managed plants do not exist in ecosystems. This is not correct. An adjective or qualifying term is needed before "ecosystem".</p>
828	6. Communication	C	<p><i>Category : TECHNICAL (1598) European Union (27 Sep 2023 7:40 PM)</i></p> <p>This is generic. Is it better to combine with the main body of the standard?</p>
828	6. Communication	C	<p><i>Category : TECHNICAL (1311) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>This is generic, is it better to combine with the main body of the standard?</p>
829	<p>Phytosanitary measures taken in relation to potential environmental consequences should, as appropriate, be notified to relevant competent authorities responsible for national biodiversity policies, strategies and action plans.</p>	C	<p><i>Category : SUBSTANTIVE (1599) European Union (27 Sep 2023 7:41 PM)</i></p> <p>In addition to "competent authorities responsible for national biodiversity policies, strategies and action plans" there are likely to be other stakeholders with an interest. Comment is needed to reflect that other</p>

			stakeholders may also be engaged with / communicated to. It is clear that stakeholders should be engaged with/communicated to at all the stages. Consequently, is it necessary to specify here?
829	Phytosanitary measures taken in relation to potential environmental consequences should, as appropriate, be notified to relevant competent authorities responsible for national biodiversity policies, strategies and action plans.	C	Category : SUBSTANTIVE (1312) EPPO (26 Sep 2023 10:55 AM) In addition to "competent authorities responsible for national biodiversity policies, strategies and action plans" there are likely to be other stakeholders with an interest. Comment is needed to reflect that other stakeholders may also be engaged with / communicated to. It is clear that stakeholders should be engaged with/communicated to at all the stages. Consequently, is it necessary to specify here?
839	ANNEX 5: Living modified organisms as pests	C	(307) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 6:05 PM] Red - The texts in Annex5 are from ISPM11. Some parts are editorially changed
842	The pest risk that may be posed by a living modified organism (<u>LMO</u>) is within the scope of the IPPC and should be considered using PRA to inform decisions regarding pest risk management. <u>The risk analysis procedures of the IPPC are generally concerned with phenotypic characteristics rather than genotypic characteristics. However, genotypic characteristics may need to be considered when assessing the pest risk posed by an LMO.</u>	P	Category : TECHNICAL (1600) European Union (27 Sep 2023 7:43 PM) See comment on paragraph 849.
842	The pest risk that may be posed by a living modified organism (<u>LMO</u>) is within the scope of the IPPC and should be considered using PRA to inform decisions regarding pest risk management. <u>The risk analysis procedures of the IPPC are generally concerned with phenotypic characteristics rather than genotypic characteristics. However, genotypic characteristics may need to be considered when assessing the pest risk posed by an LMO.</u>	P	Category : TECHNICAL (1313) EPPO (26 Sep 2023 10:55 AM) see comment on paragraph 849
843	This annex includes guidance on evaluating the potential pest risk posed by an LMO. This guidance does not alter the scope of this standard but is intended to	P	Category : TECHNICAL (1601) European Union (27 Sep 2023

	<p>clarify issues related to the PRA of LMOs. This annex should be read in conjunction with Annexes 1, <u>2-2</u>, <u>3</u>, <u>5</u> and <u>3-6</u> of this standard.</p>		<p>7:44 PM) Accuracy. Could also be redrafted to 'should be read with all other annexes of this standard'.</p>
843	<p>This annex includes guidance on evaluating the potential pest risk posed by an LMO. This guidance does not alter the scope of this standard but is intended to clarify issues related to the PRA of LMOs. This annex should be read in conjunction with Annexes 1, <u>2-2</u>, <u>3</u>, <u>5</u> and <u>3-6</u> of this standard.</p>	P	<p>Category : TECHNICAL (1314) EPPO (26 Sep 2023 10:55 AM) Accuracy. Could also be redrafted to 'should be ready with all other annexes of this standard'</p>
845	<p>Some LMOs may pose a pest risk and therefore warrant a PRA. However, other LMOs will not pose a pest risk beyond that posed by related non-LMOs and therefore will not warrant a complete PRA. <u>For example, modifications to change the physiological characteristics of a plant (e.g. ripening time, storage life) may not change the pest risk posed by that plant.</u> The pest risk that may be posed by an LMO is dependent on a combination of factors, including the characteristics of the donor and recipient organisms, the genetic alteration, and the specific new trait or traits. It may be useful, therefore, to consider the pest risk posed by an LMO in the context of the pest risk posed by the non-modified recipient or parental organisms, or similar organisms, in the PRA area. Section 2 of this annex therefore provides guidance on how to determine if an LMO is a potential pest.</p>	P	<p>Category : TECHNICAL (1602) European Union (27 Sep 2023 7:46 PM) Very bad example, for instance ripening time is a key factor in the case of fruit flies, the fruits may ripen before the adult's first flight occurs or during the diapause of the pest. Suggest removal.</p>
845	<p>Some LMOs may pose a pest risk and therefore warrant a PRA. However, other LMOs will not pose a pest risk beyond that posed by related non-LMOs and therefore will not warrant a complete PRA. <u>For example, modifications to change the physiological characteristics of a plant (e.g. ripening time, storage life) may not change the pest risk posed by that plant.</u> The pest risk that may be posed by an LMO is dependent on a combination of factors, including the characteristics of the donor and recipient organisms, the genetic alteration, and the specific new trait or traits. It may be useful, therefore, to consider the pest risk posed by an LMO in the context of the pest risk posed by the non-modified recipient or parental organisms, or similar organisms, in the PRA area. Section 2 of this annex therefore provides guidance on how to determine if an LMO is a potential pest.</p>	P	<p>Category : TECHNICAL (1315) EPPO (26 Sep 2023 10:55 AM) Not appropriate example, for instance ripening time is a key factor in the case of fruit flies, the fruits may ripen before the adult's first flight occurs or during the diapause of the pest. Suggest removal.</p>
846	<p>Pest risk analysis may constitute only a portion of the overall risk analysis for the import and release of an LMO. For example, countries may require the assessment of risks to human or animal health, or to the environment, beyond that covered by the IPPC. This annex only relates to the assessment and management of the risks within the scope of the IPPC. As with other organisms or pathways assessed by an NPPO, LMOs may pose other risks</p>	C	<p>Category : EDITORIAL (1603) European Union (27 Sep 2023 7:46 PM) See note within general comments about other authorities. It is clear that stakeholders should be engaged with/ communicated to at all the</p>

	not falling within the scope of the IPPC. When an NPPO discovers potential for risks that are not of phytosanitary concern it may be appropriate to notify the relevant authorities.		stages. Consequently, is it necessary to specify here?
846	Pest risk analysis may constitute only a portion of the overall risk analysis for the import and release of an LMO. For example, countries may require the assessment of risks to human or animal health, or to the environment, beyond that covered by the IPPC. This annex only relates to the assessment and management of the risks within the scope of the IPPC. As with other organisms or pathways assessed by an NPPO, LMOs may pose other risks not falling within the scope of the IPPC. When an NPPO discovers potential for risks that are not of phytosanitary concern it may be appropriate to notify the relevant authorities.	C	<p>Category : TECHNICAL (1316) EPPO (26 Sep 2023 10:55 AM) See note within general comments about other authorities. It is clear that stakeholders should be engaged with/ communicated to at all the stages. Consequently, is it necessary to specify here?</p>
849	The risk analysis procedures of the IPPC are generally concerned with phenotypic characteristics rather than genotypic characteristics. However, genotypic characteristics may need to be considered when assessing the pest risk posed by an LMO.	P	<p>Category : EDITORIAL (1604) European Union (27 Sep 2023 7:47 PM) This paragraph seems more appropriate in the introduction to Annex 5. Suggest append paragraph 849 to the end of paragraph 842.</p>
849	<ins>The risk analysis procedures of the IPPC are generally concerned with phenotypic characteristics rather than genotypic characteristics. However, genotypic characteristics may need to be considered when assessing the pest risk posed by an LMO.</ins>	P	<p>Category : TECHNICAL (1317) EPPO (26 Sep 2023 10:55 AM) This paragraph seems more appropriate in the introduction to Annex 5. Suggest append paragraph 849 to the end of paragraph 842</p>
851	This annex is relevant for LMOs only where there is potential for the pest risk posed by an LMO to result from some characteristic or property related to the genetic modification. Other pest risk posed by the organism should be assessed under other appropriate sections or annexes of this standard or under other appropriate ISPMs.	C	<p>Category : TECHNICAL (1605) European Union (27 Sep 2023 7:48 PM) What are the other appropriate ISPMs to use when assessing pest risk? Please identify them explicitly, as occurs for example in paragraphs 19 and 59.</p>
851	This annex is relevant for LMOs only where there is potential for the pest risk posed by an LMO to result from some characteristic or property related to the genetic modification. Other pest risk posed by the organism should be assessed under other appropriate sections or annexes of this standard or under other appropriate ISPMs.	C	<p>Category : TECHNICAL (1318) EPPO (26 Sep 2023 10:55 AM) What are the other appropriate ISPMs to use when assessing pest risk? Please identify them explicitly, as occurs for example in paragraphs 19 and 59.</p>
853	2.1 Potential characteristics or properties of living modified organisms that may affect pest risk	C	<p>Category : SUBSTANTIVE (1606) European Union (27 Sep 2023 7:49 PM) This part may need a revision in accordance with cases where such organisms have</p>

			already been subjected to a PRA in the past, to consider relevant experiences.
853	2.1 Potential characteristics or properties of living modified organisms that may affect pest risk	C	<i>Category : SUBSTANTIVE (1319) EPPO (26 Sep 2023 10:55 AM)</i> This part may need a revision in accordance with cases where such organisms have already been subjected to a PRA in the past, to consider relevant experiences.
877	pest risk resulting from nucleic acid sequences (markers (for example markers, promoters, terminators, etc.) present in the insert.	P	<i>Category : EDITORIAL (1607) European Union (27 Sep 2023 7:50 PM)</i> Improved drafting.
877	pest risk resulting from nucleic acid sequences (markers (for example markers, promoters, terminators, etc.) present in the insert.	P	<i>Category : EDITORIAL (1320) EPPO (26 Sep 2023 10:55 AM)</i> improved drafting
894	43. Initiation (PRA Stage 1)	P	<i>Category : EDITORIAL (1074) Japan (25 Sep 2023 4:32 AM)</i>
895	The aim of the initiation stage is to identify LMOs that have the characteristics of a potential pest and need to be assessed further, and those which need no further assessment under this standard.	C	<i>Category : EDITORIAL (1608) European Union (27 Sep 2023 7:51 PM)</i> Suggest moving text from this paragraph to below paragraph 896.
895	The aim of the initiation stage is to identify LMOs that have the characteristics of a potential pest and need to be assessed further, and those which need no further assessment under this standard.	C	<i>Category : EDITORIAL (1321) EPPO (26 Sep 2023 10:55 AM)</i> Suggest move text from this paragraph to below paragraph 896
896	Living modified organisms are organisms that have been modified using techniques of modern biotechnology to express one or more new or altered traits. In most cases, the parent organism is not normally considered to be a pest but an assessment may need to be performed to determine if the genetic modification (i.e. gene, new gene sequence that regulates other genes, or gene product) results in a new trait or characteristic that may pose a pest risk.	C	<i>Category : EDITORIAL (1609) European Union (27 Sep 2023 7:52 PM)</i> This seems to be an introductory text. Suggest it comes before current text for paragraph 895.
896	Living modified organisms are organisms that have been modified using techniques of modern biotechnology to express one or more new or altered traits. In most cases, the parent organism is not normally considered to be a pest but an assessment may need to be performed to determine if the genetic modification (i.e. gene, new gene sequence that regulates other genes, or gene product) results in a new trait or characteristic that may pose a pest risk.	C	<i>Category : EDITORIAL (1322) EPPO (26 Sep 2023 10:55 AM)</i> This seems to be an introductory text. Suggest it comes before current text for paragraph 895

929	5.1.3 Potential for establishment and spread in <u>the PRA area</u>	P	<i>Category : EDITORIAL (1610) European Union (27 Sep 2023 7:52 PM)</i> Improved drafting.
929	5.1.3 Potential for establishment and spread in <u>the PRA area</u>	P	<i>Category : EDITORIAL (1323) EPPO (26 Sep 2023 10:55 AM)</i> improved drafting
937	Assessing the probability of introduction of an LMO requires an analysis of both intentional or and unintentional pathways of introduction, and intended use.	P	<i>Category : EDITORIAL (599) Ghana (31 Aug 2023 12:05 AM)</i>
956	potential economic consequences that could result from adverse effects on non-target organisms that are injurious to plants or plant products <ins>organisms</ins> ; and	P	<i>Category : TECHNICAL (1611) European Union (27 Sep 2023 7:53 PM)</i> Text deleted as it confuses the sentence.
956	potential economic consequences that could result from adverse effects on non-target organisms that are injurious to plants or plant products ; and	P	<i>Category : TECHNICAL (1324) EPPO (26 Sep 2023 10:55 AM)</i> text deleted as it confuses the sentence
957	economic consequences that could result from pest properties.	C	<i>Category : SUBSTANTIVE (1612) European Union (27 Sep 2023 7:54 PM)</i> Text on environmental impacts and potential social consequences that result from pest properties of the LMO should also be considered.
957	economic consequences that could result from pest properties.	C	<i>Category : SUBSTANTIVE (1325) EPPO (26 Sep 2023 10:55 AM)</i> Text on environmental impacts and potential social consequences that result from pest properties of the LMO should also be considered.
962	Measures may include procedures for the provision of information on the integrity of consignments (e.g. consignments , for example tracing systems, documentation systems, identity-preservation systems) <ins>systems</ins> .	P	<i>Category : EDITORIAL (1613) European Union (27 Sep 2023 7:55 PM)</i> Improved drafting.
962	Measures may include procedures for the provision of information on the integrity of consignments (e.g. for example tracing systems, documentation systems, identity-preservation systems) <ins>systems</ins> .	P	<i>Category : EDITORIAL (1326) EPPO (26 Sep 2023 10:55 AM)</i> Improved drafting
970	The potential pest risk posed by LMO pests depends in part on the intended use. As for other organisms, certain intended uses (such as high-security contained use) may significantly manage mitigate pest risk.	P	<i>Category : TECHNICAL (1614) European Union (27 Sep 2023 7:56 PM)</i> Accuracy.
970	The potential pest risk posed by LMO pests depends in part on the intended use. As for other organisms, certain intended uses (such as high-security contained use)	P	<i>Category : TECHNICAL (1327) EPPO (26 Sep 2023 10:55 AM)</i>

	may significantly manage mitigate pest risk.		Accuracy
983	ANNEX 6: Pest risk analysis for plants as quarantine pests	C	(308) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 6:05 PM] Red - The texts in Annex6 are from ISPM11. Some parts are editorially changed
986	This annex provides specific guidance on conducting PRA to determine if a plant is a pest of cultivated or wild plants, whether it should be regulated, and to identify phytosanitary measures that reduce the pest risk to an acceptable level. It focuses primarily on plants proposed for import, whether as plants for planting or for other intended uses. It does not cover the unintentional introduction of plants as contaminating pests in commodities or conveyances.	C	<i>Category : EDITORIAL</i> (1615) European Union (27 Sep 2023 7:57 PM) The text in the whole document should consistently use the terms "uncultivated", "unmanaged" and/or "wild", as already commented above.
986	This annex provides specific guidance on conducting PRA to determine if a plant is a pest of cultivated or wild plants, whether it should be regulated, and to identify phytosanitary measures that reduce the pest risk to an acceptable level. It focuses primarily on plants proposed for import, whether as plants for planting or for other intended uses. It does not cover the unintentional introduction of plants as contaminating pests in commodities or conveyances.	C	<i>Category : EDITORIAL</i> (1328) EPPO (26 Sep 2023 10:55 AM) The text in the whole document should be consistently using the terms "uncultivated", "unmanaged" and/or "wild", as already commented above.
992	"Invasive plants" are often taken to mean invasive alien species in the sense used in the Convention on Biological Diversity (see ISPM 5, Appendix 1). The term "weed" usually refers to pests of cultivated plants. However, some countries use the term "weed" irrespective of whether cultivated plants or wild flora are at risk, and other countries use the term "noxious weed", "landscape weed", "environmental weed" or similar terms to distinguish them from plants only affecting crops.	C	<i>Category : SUBSTANTIVE</i> (585) Eritrea (29 Aug 2023 4:06 PM) The draft document appears to be well prepared and acceptable at this stage of consultation.
1006	The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar <ins>variety</ins>) may be justified if there is scientific evidence demonstrating that differences in characteristics are stable and may significantly affect the pest risk. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivores, and methods of reproduction or propagule dispersal.	P	<i>Category : TECHNICAL</i> (1616) European Union (27 Sep 2023 7:58 PM) Is there a need for both "variety" and "cultivar"? Cultivar is short for cultivated variety so a cultivar is also a variety.
1006	The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar <ins>variety</ins>) may be justified if there is scientific evidence demonstrating that differences in characteristics are stable and may significantly affect the pest risk. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivores, and methods of	P	<i>Category : TECHNICAL</i> (1329) EPPO (26 Sep 2023 10:55 AM) Is there a need for both "variety" and "cultivar"? Cultivar is short for cultivated variety so a cultivar is also a variety.

	<p>reproduction or propagule dispersal.</p>		
1012	<p><u>The PRA should include consideration of the intended use (see ISPM 32) of the plant being assessed, as this may affect the probability of establishment, spread and economic consequences. However, it should also be recognized that plants, once entered, may escape or be diverted from the use for which they were originally intended.</u> <u>The PRA should include consideration of the intended use (see ISPM 32) of the plant being assessed, as this may affect the likelihood of establishment, spread and economic consequences and, although there are some plants that once entered, may escape or be diverted from the use for which they were originally intended; for other types of products, this should not be a reason to impose similar restrictive phytosanitary measures on those products with a high-risk intended use, when the evaluated product has a lower-risk intended use.</u></p>	P	<p><i>Category : SUBSTANTIVE (1720) Mexico (30 Sep 2023 12:55 AM)</i></p> <p>In order not to give so much weight to the diversion from the intended use, since this is a problem of the importing country, which when evaluating the pest risk must ensure a rational relationship between the risk and the intensity of the measures or risk management in cases of diversion of the intended use, this is not a problem of the exporting country.</p>
1013	<p>In the case of plants for planting, significant human effort is made to ensure their continuous survival and, in some cases, successful reproduction, because of their perceived benefits. Furthermore, the plants for planting have often been selected to be well suited for growing in the importing country. This significantly increases the <u>likelihood</u>-<u>probability</u> of establishment and spread. Therefore, plants for planting are generally considered to pose the highest pest risk. Examples of intended uses, broadly in the order of decreasing pest risk at the time of planting, are:</p>	P	<p><i>Category : EDITORIAL (1617) European Union (27 Sep 2023 7:59 PM)</i></p> <p>For consistency, because "probability" is the term usually used in PRA standards and this draft.</p>
1013	<p>In the case of plants for planting, significant human effort is made to ensure their continuous survival and, in some cases, successful reproduction, because of their perceived benefits. Furthermore, the plants for planting have often been selected to be well suited for growing in the importing country. This significantly increases the <u>likelihood</u>-<u>probability</u> of establishment and spread. Therefore, plants for planting are generally considered to pose the highest pest risk. Examples of intended uses, broadly in the order of decreasing pest risk at the time of planting, are:</p>	P	<p><i>Category : EDITORIAL (1330) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>For consistency, because "probability" is the term usually used in PRA standards and this draft.</p>
1013	<p>In the case of plants for planting, significant human effort is made to ensure their continuous survival and, in some cases, successful reproduction, because of their perceived benefits. Furthermore, the plants for planting have often been selected to be well suited for growing in the importing country. This significantly increases the <u>likelihood</u>-<u>probability</u> of establishment and spread. Therefore, plants for planting are generally considered to pose the highest pest risk. Examples of intended uses, broadly in the order of decreasing pest risk at the time of planting, are:</p>	P	<p><i>Category : TECHNICAL (893) COSAVE (12 Sep 2023 9:37 PM)</i></p> <p>For consistency</p>
1013	<p>In the case of plants for planting, significant human effort is made to ensure their continuous survival and, in some cases, successful reproduction, because of their perceived benefits. Furthermore, the plants for planting have often been selected to</p>	P	<p><i>Category : TECHNICAL (751) Uruguay (8 Sep 2023 4:27 PM)</i></p> <p>For consistency</p>

	<p>be well suited for growing in the importing country. This significantly increases the <u>likelihood probability</u> of establishment and spread. Therefore, plants for planting are generally considered to pose the highest pest risk. Examples of intended uses, broadly in the order of decreasing pest risk at the time of planting, are:</p>		
1027	<p>For imported plants, the assessment of probability of entry is not relevant. Nevertheless, where an estimation of the volume, frequency and destinations of prospective imports is needed in order to assess the <u>likelihood probability</u> of establishment and spread, NPPOs should consider such estimations in the pest risk assessment. In addition, the probability of entry should be assessed for pests that may be carried by these plants, such as contaminating seeds carried with seeds imported for planting.</p>	P	<p><i>Category : EDITORIAL (1618) European Union (27 Sep 2023 8:00 PM)</i></p> <p>For consistency, because "probability" is the term usually used in PRA standards and this draft.</p>
1027	<p>For imported plants, the assessment of probability of entry is not relevant. Nevertheless, where an estimation of the volume, frequency and destinations of prospective imports is needed in order to assess the <u>likelihood probability</u> of establishment and spread, NPPOs should consider such estimations in the pest risk assessment. In addition, the probability of entry should be assessed for pests that may be carried by these plants, such as contaminating seeds carried with seeds imported for planting.</p>	P	<p><i>Category : EDITORIAL (1331) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>For consistency, because "probability" is the term usually used in PRA standards and this draft.</p>
1027	<p>For imported plants, the assessment of probability of entry is not relevant. Nevertheless, where an estimation of the volume, frequency and destinations of prospective imports is needed in order to assess the <u>likelihood probability</u> of establishment and spread, NPPOs should consider such estimations in the pest risk assessment. In addition, the probability of entry should be assessed for pests that may be carried by these plants, such as contaminating seeds carried with seeds imported for planting.</p>	P	<p><i>Category : TECHNICAL (894) COSAVE (12 Sep 2023 9:40 PM)</i></p> <p>For consistency</p>
1027	<p>For imported plants, the assessment of probability of entry is not relevant. Nevertheless, where an estimation of the volume, frequency and destinations of prospective imports is needed in order to assess the <u>likelihood probability</u> of establishment and spread, NPPOs should consider such estimations in the pest risk assessment. In addition, the probability of entry should be assessed for pests that may be carried by these plants, such as contaminating seeds carried with seeds imported for planting.</p>	P	<p><i>Category : TECHNICAL (752) Uruguay (8 Sep 2023 4:27 PM)</i></p> <p>For consistency</p>
1047	<p>The <u>likelihood probability</u> and extent of spread depends on natural and human-mediated factors. Natural factors may include:</p>	P	<p><i>Category : EDITORIAL (1619) European Union (27 Sep 2023 8:01 PM)</i></p>

			For consistency, because "probability" is the term usually used in PRA standards and this draft.
1047	The likelihood probability and extent of spread depends on natural and human-mediated factors. Natural factors may include:	P	<p>Category : EDITORIAL (1332) EPPO (26 Sep 2023 10:55 AM) For consistency, because "probability" is the term usually used in PRA standards and this draft.</p>
1063	changes in climate (e.g. warmer climate, changes in precipitation patterns).	P	<p>Category : TECHNICAL (1046) Canada (22 Sep 2023 10:42 PM) this bullet has been moved to the bulleted list in Annex 2, Section 3.3. By moving this bullet to Annex 2, it would become part of guidance on pest risk assessment for all pests rather than a special consideration solely for plants as pests</p>
1064	4.9 Assessment of potential economic consequences	P	<p>Category : SUBSTANTIVE (895) COSAVE (12 Sep 2023 9:42 PM) See general comment</p>
1064	4.9 Assessment of potential economic consequences	P	<p>Category : SUBSTANTIVE (754) Uruguay (8 Sep 2023 4:39 PM) See general comment</p>
1065	Plants as pests may have a variety of <u>economic</u> consequences, including yield losses in agriculture, horticulture and forestry; reduction of recreational value; or reduction of biodiversity and negative effects on other parts of the ecosystem. Assessment of <u>economic</u> consequences of plants as pests may be inherently difficult because they may have broad agricultural, environmental and social consequences that may be non-specific, not readily apparent or not easily quantified (e.g. changes in the soil's nutrient profile).	P	<p>Category : SUBSTANTIVE (896) COSAVE (12 Sep 2023 9:43 PM) See general comment</p>
1065	Plants as pests may have a variety of <u>economic</u> consequences, including yield losses in agriculture, horticulture and forestry; reduction of recreational value; or reduction of biodiversity and negative effects on other parts of the ecosystem. Assessment of <u>economic</u> consequences of plants as pests may be inherently difficult because they may have broad agricultural, environmental and social consequences that may be non-specific, not readily apparent or not easily quantified (e.g. changes in the soil's nutrient profile).	P	<p>Category : SUBSTANTIVE (755) Uruguay (8 Sep 2023 4:41 PM) See general comment</p>
1066	The assessment should also consider the potential long-term <u>economic</u> consequences for the entire PRA area, including where the plants are intended to grow. In particular, in the case of plants for planting that may be pests, the long-	P	<p>Category : SUBSTANTIVE (897) COSAVE (12 Sep 2023 9:43 PM) See general comment</p>

	term <u>economic</u> consequences for the habitat in which the plants are intended to grow may be included in the assessment because planting may affect further use of, or have a harmful effect on, that habitat.		
1066	The assessment should also consider the potential long-term <u>economic</u> consequences for the entire PRA area, including where the plants are intended to grow. In particular, in the case of plants for planting that may be pests, the long-term <u>economic</u> consequences for the habitat in which the plants are intended to grow may be included in the assessment because planting may affect further use of, or have a harmful effect on, that habitat.	P	<i>Category : SUBSTANTIVE (756) Uruguay (8 Sep 2023 4:42 PM)</i> See general comment
1067	The most reliable predictor of potential <u>economic</u> consequences is evidence of consequences elsewhere, particularly in areas with similar habitats. However, in some cases, plants have never been moved out of their native ranges and therefore may not have had an opportunity to express any potential <u>economic</u> consequences. In the absence of evidence of <u>economic</u> consequences elsewhere, consideration may be given to whether or not the plant possesses intrinsic characteristics that predict pest potential, such as those discussed in sections 4.7 and 4.8 of this annex and in section 3.2.5 of Annex 2 related to establishment and spread.	P	<i>Category : SUBSTANTIVE (898) COSAVE (12 Sep 2023 9:45 PM)</i> See general comment
1067	The most reliable predictor of potential <u>economic</u> consequences is evidence of consequences elsewhere, particularly in areas with similar habitats. However, in some cases, plants have never been moved out of their native ranges and therefore may not have had an opportunity to express any potential <u>economic</u> consequences. In the absence of evidence of <u>economic</u> consequences elsewhere, consideration may be given to whether or not the plant possesses intrinsic characteristics that predict pest potential, such as those discussed in sections 4.7 and 4.8 of this annex and in section 3.2.5 of Annex 2 related to establishment and spread.	P	<i>Category : SUBSTANTIVE (757) Uruguay (8 Sep 2023 4:44 PM)</i> See general comment
1068	5. Pest risk management (PRA Stage 3)	C	<i>Category : TECHNICAL (1077) Canada (25 Sep 2023 4:10 PM)</i> General comment: In the original ISPM 11, in Annex 4 Stage 3, there is a section entitled "Aspects common to all PRA stages" followed by "Risk communication", which contains text that highlights the particular importance of risk communication in relation to plants as pests. This text appears to have been omitted from the draft ISPM. However we would suggest that the content is useful for NPPOs and should be retained,

			either in Annex 6 or near the beginning of the standard in section 2, "Aspects common to all PRA stages."
1082	Potential implementation issues <u>There is a lack of guidance on climate change impacts on pest and pest risks</u>	P	<i>Category : TECHNICAL (1040) Canada (22 Sep 2023 5:52 PM)</i>
1093	APPENDIX 1: Pest risk analysis flow chart	C	<i>Category : EDITORIAL (1706) Australia (29 Sep 2023 6:22 AM)</i> Suggest including this diagram higher in the document as it is useful for guiding readers through this large and complex standard. Ensure this table is put before the 'requirements' of the PRA to alleviate any potential concerns about it being in the "ISPM" itself.
1093	APPENDIX 1: Pest risk analysis flow chart	C	<i>Category : SUBSTANTIVE (1666) China (28 Sep 2023 3:23 AM)</i> change management options to conclusion. The previous stage3 box is full of management options, and the arrow is not repeated. It is also stated in paragraph 777 that the conclusion includes the situation where there is no suitable risk management option, so it is more appropriate to use "conclusion".
1093	APPENDIX 1: Pest risk analysis (PRA) flow chart	P	<i>Category : EDITORIAL (1622) European Union (27 Sep 2023 8:03 PM)</i> Improved drafting (please see our following comment).
1093	APPENDIX 1: Pest risk analysis flow chart	C	<i>Category : SUBSTANTIVE (1621) European Union (27 Sep 2023 8:03 PM)</i> In the old chart it was clearly indicated that the part in grey (monitoring of management and regulatory decision) is 'Beyond the PRA process'. The lines in the new figure are still grey but this aspect is no longer explicitly stated in the chart. It is appropriate to add this information again in a footnote or short explication. We believe that the flowchart is at the

			<p>moment incomplete, some steps are missing and are not consistent with the text. EPPO has elaborated a new flowchart that can be shared. Please contact lucchesi@eppo.int.</p> <p>"Selection of options" can be misunderstood and considered as a responsibility of the policy maker instead of part of pest risk management (Stage 3). Consequently either it should be explained or reworded to avoid possible misunderstanding.</p>
1093	APPENDIX 1: Pest risk analysis flow chart	C	<p><i>Category : EDITORIAL (1620) European Union (27 Sep 2023 8:02 PM)</i></p> <p>1) Why the title of the figure is "Pest risk analysis framework" and not "Pest risk analysis flowchart" as the title of Appendix 1? 2) For stage 1 (Initiation), why "organism" is after "policy review" and not just after "pest"?</p>
1093	APPENDIX 1: Pest risk analysis (<u>PRA</u>) flow chart	P	<p><i>Category : TECHNICAL (1333) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Improved drafting (please see our following comment)</p>
1093	APPENDIX 1: Pest risk analysis flow chart	C	<p><i>Category : SUBSTANTIVE (1335) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>In the old chart it was clearly indicated that the part in grey (monitoring of management and regulatory decision) is 'Beyond the PRA process'. The lines in the new figure are still grey but this aspect is no longer explicitly stated in the chart. It is appropriate to add this information again in a footnote or short explication.</p> <p>We believe that the flowchart is at the moment incomplete, some steps are missing and are not consistent with the text. EPPO has elaborated a new flowchart that can be shared. Please contact lucchesi@eppo.int.</p> <p>"Selection of options" can be misunderstood and considered as a responsibility of the policy maker instead of part of pest risk</p>

			management (Stage 3). Consequently either it should be explained or reworded to avoid possible misunderstanding.
1093	APPENDIX 1: Pest risk analysis flow chart	C	<p><i>Category : EDITORIAL (1334) EPPO (26 Sep 2023 10:55 AM)</i></p> <ul style="list-style-type: none"> - Why the title of the figure is "Pest risk analysis framework" and not "Pest risk analysis flowchart" as the title of Appendix 1? - For stage 1 (Initiation), why "organism" is after "policy review" and not just after "pest"?
1093	APPENDIX 1: Pest risk analysis flow chart	C	<p>(309) Imported Comment (30 Jun 2023 3:20 PM) [Originally made by M.Sai on 21 May 2023 5:40 PM] Black - Appendix-1 from ISPM2 is revised</p>
1095		C	<p><i>Category : EDITORIAL (1705) Australia (29 Sep 2023 6:22 AM)</i></p> <p>Suggest making the flow chart slightly bigger and increasing the font size to increase readability</p>
1096	<i>Note: PRA, pest risk analysis. <u>This sentence is included in the ISPM2 flowchart. It is really inappropriate to put it in the picture, so it is recommended to add a note description.</u></i>	P	<p><i>Category : SUBSTANTIVE (1667) China (28 Sep 2023 3:24 AM)</i></p> <p>grey arrow part is beyond the pra process</p>
1096	<i>Note: PRA, pest risk analysis.</i>	P	<p><i>Category : EDITORIAL (1623) European Union (27 Sep 2023 8:04 PM)</i></p> <p>Improved drafting (please see our previous comment).</p>
1096	<i>Note: PRA, pest risk analysis.</i>	P	<p><i>Category : TECHNICAL (1336) EPPO (26 Sep 2023 10:55 AM)</i></p> <p>Improved drafting (please see our previous comment)</p>
1096	<i>Note: 1.PRA, pest risk analysis. 2. grey arrow part is beyond the pra process</i>	P	<p><i>Category : SUBSTANTIVE (1117) APPPC (26 Sep 2023 10:36 AM)</i></p> <p>This sentence is included in the ISPM2 flowchart. It is really inappropriate to put it in the picture, so it is recommended to add a note description.</p>

Compiled comments in Spanish for 2023 First Consultation: 2020-001_Draft ISPM_PRA**Summary****Participants**

Name	Summary
Barbados	Barbados supports this revision.
European Union	The comments on the draft standard are submitted by the European Commission on behalf of the European Union and its 27 Member States.
Fiji Σ	Comments consolidated in PPPO review document at PPPO meeting in Cook Islands
Gabon	document validé
Malawi	We support the reorganization and revision of PRA standards
Nigeria	The processes outlined in this standard are sufficient enough to have a comprehensive PRA
Rania ElHayek	pest risk must include seeds on commodities, cause there is a risk that they may accidentally spread with seeds
Singapore	Singapore is supportive of this draft standard.

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

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

Para	Text	T	Comment
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE (1722) Costa Rica (30 Sep 2023 4:10 AM)</i></p> <p>Costa Rica30 sep. 2023 4:08#1721 Categoría: TECHNICAL Última actualización: 30 sep. 2023 4:09 La traducción más apropiada para "effectiveness" sería efectividad mantener el título de la NIMF 11 "Análisis de Riesgo de Plagas para Plagas Cuarentenarias" y mantener el número 11 para el documento final reorganizado Se sugiere evaluar la posibilidad de integrar el Anexo 4 sobre riesgos ambientales al texto central y a los anexos 1, 2 y 3 según corresponda Se consideran pertinente que el proyecto de norma de ARP incluya completo las etapas</p>

			<p>del ARP (los anexos 1 al 3) para hacer entendible y aplicable el proceso y separar del cuerpo de la norma los Anexos que comprenden del 4 al 6. El texto actual es poco entendible y extenso (impráctico) se considera que se pierde objetividad en el análisis de riesgo</p> <p>Revisar a detalle todo el cuerpo de la propuesta de norma a fin de actualizar los términos acorde a la NIMF 5</p> <p>No se comparte el uso del término consecuencias sin el calificativo. Sugerimos mantener el uso de términos relacionados con la importancia económica potencial tal como se usan en la NIMF 11 vigente. El Suplemento 2 de la NIMF 5 explica que todos los tipos de impactos están incluidos en el término consecuencias económicas.</p> <p>Por otra parte la expresión es parte de la definición misma de plaga cuarentenaria.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(1714) Peru (29 Sep 2023 10:35 PM)</p> <p>Perú esta de acuerdo con los comentarios concordados como COSAVE</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p>(1516) Colombia (27 Sep 2023 5:59 PM)</p> <p>En el contexto de esta norma la traducción adecuada de la palabra "pathways" es vías de ingreso por tanto se sugiere modificar en todo el cuerpo del documento la palabra "vías" por "vías de ingreso"</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p>(1515) Colombia (27 Sep 2023 5:57 PM)</p> <p>En el contexto de esta norma, la traducción adecuada de la palabra management es gestión, por lo tanto, se sugiere modificar en todo el cuerpo del documento el término "manejo" por "gestión"</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(1036) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p> <p>Uruguay (20 ago 2023 5:05)</p> <p>No se comparte el uso del término</p>

			consecuencias sin el calificativo. Sugerimos mantener el uso de términos relacionados con la importancia económica potencial tal como se usan en la NIMF 11 vigente. El Suplemento 2 de la NIMF 5 explica que todos los tipos de impactos están incluidos en el término consecuencias económicas. Por otra parte la expresión es parte de la definición misma de plaga cuarentenaria.
G	(General Comment)	C	<p><i>Category : EDITORIAL</i></p> <p>(1035) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p> <p>OIRSA (15 ago 2023 7:53)</p> <p>Revisar la numeración del cuerpo de la norma.</p> <p>Revisar a detalle todo el cuerpo de la propuesta de norma a fin de actualizar los términos acorde a la NIMF 5</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p>(1034) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p> <p>OIRSA (15 ago 2023 7:52)</p> <p>Se consideran pertinente que el proyecto de norma de ARP incluya completo las etapas del ARP (los anexos 1 al 3) para hacer entendible y aplicable el proceso y separar del cuerpo de la norma los Anexos que comprenden del 4 al 6. El texto actual es poco entendible y extenso (impráctico) se considera que se pierde objetividad en el análisis de riesgo</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(1033) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p> <p>Se sugiere evaluar la posibilidad de integrar el Anexo 4 sobre riesgos ambientales al texto central y a los anexos 1, 2 y 3 según corresponda.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(1032) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p> <p>El taller sugiere mantener el título de la NIMF 11 "Análisis de Riesgo de Plagas para Plagas Cuarentenarias" y mantener el número 11 para el documento final</p>

G	(General Comment)	C reorganizado.
G	(General Comment)	C Category : TRANSLATION (1031) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) La traducción más apropiada para "effectiveness" seria efectividad
G	(General Comment)	C Category : TECHNICAL (556) OIRSA (27 Jul 2023 11:39 PM) el cuerpo de la norma no considera la evaluación específica de instalaciones y que fueran las únicas autorizadas para importar un producto en específico. También falta incluir una evaluación a categorías de producto por nivel de riesgo de plagas.
G	(General Comment)	C Category : TECHNICAL (557) Dominican Republic (27 Jul 2023 11:39 PM) falta incluir categoría de producto por nivel de riesgos de plagas
G	(General Comment)	C Category : TECHNICAL (555) Dominican Republic (27 Jul 2023 11:37 PM) El cuerpo de la norma no contempla evaluaciones específica de instalaciones y que fueran la únicas autorizadas.
G	(General Comment)	C Category : TECHNICAL (542) OIRSA (27 Jul 2023 11:08 PM) cambiar en el cuerpo de la norma "Eficacia" por "Efectividad de la medida" en consistencia con la versión en inglés.
G	(General Comment)	C Category : TECHNICAL (522) Dominican Republic (27 Jul 2023 10:13 PM) se consideran pertinente que el proyecto de norma ARP incluya completa las etapas del ARP (los anexos 1 al 3) para hacer entendible y aplicable el proceso y separar del cuerpo de la norma los anexos que componen 4 al 6. el texto es poco entendible y extenso.
G	(General Comment)	C Category : TECHNICAL (521) OIRSA (27 Jul 2023 10:12 PM) Se consideran pertinente que el proyecto de norma de ARP incluya completo las etapas del ARP (los anexos 1 al 3) para hacer

			entendible y aplicable el proceso y separar del cuerpo de la norma los Anexos que comprenden del 4 al 6. El texto actual es poco entendible y extenso (impráctico) se considera que se pierde objetividad en el análisis de riesgo
G	(General Comment)	C	<p><i>Category : EDITORIAL</i> (511) Dominican Republic (27 Jul 2023 8:51 PM) Al considerar los impactos ambientales y sociales como medidas para trabas comerciales</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (509) Dominican Republic (27 Jul 2023 8:43 PM) Revisar la numeración generica</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (508) OIRSA (27 Jul 2023 8:43 PM) Revisar la numeración del cuerpo de la norma.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (504) Nicaragua (27 Jul 2023 8:37 PM) Se recomienda incluir una sección sobre organismos benéficos y agentes de control biológico a como se indica en la NIMF 3</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (503) OIRSA (27 Jul 2023 8:37 PM) Se recomienda incluir una sección sobre organismos benéficos y agentes de control biológico; tal como la señala la NIMF 3, la cual no contiene los elementos básicos para el ARP de estos organismos.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (502) Guatemala (27 Jul 2023 8:36 PM) existe un riesgo en que los organismos contengan otros parasitoides que tambien pueden ser de alto riesgo, como es el caso de los organismos beneficos</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (496) OIRSA (27 Jul 2023 8:27 PM) Revisar a detalle todo el cuerpo de la propuesta de norma a fin de actualizar los términos acorde a la NIMF 5</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (494) Guatemala (27 Jul 2023 8:27 PM)</p>

			Aparece mucho el termino encuesta, ahora el que esta utilizado es prospección segun la nimf 5
1	Introducción a la reorganización y revisión de las normas <u>en materia de</u> análisis del riesgo de plagas (no es una parte oficial de la norma)	P	<p>Category : TRANSLATION (1723) Costa Rica (30 Sep 2023 4:11 AM) Para consistencia con el documento en inglés</p>
1	Introducción a la reorganización y revisión de <u>las normas en materia la normativa de análisis del riesgo-Análisis de plagas Riesgo de Plagas (ARP)</u> (no es una parte oficial de la norma)	P	<p>Category : TRANSLATION (1518) Colombia (27 Sep 2023 6:02 PM) Se sugiere cambiar la traducción, teniendo en cuenta el texto de la versión en inglés "Introduction to the reorganization and revision of PRA standards (not an official part of the standard)." Eliminar las palabras en "materia de"</p>
2	El análisis del riesgo de plagas (ARP) es un proceso <u>básico fundamental dentro</u> del ámbito de la Convención Internacional de Protección Fitosanitaria (CIPF). La orientación para las organizaciones nacionales de protección fitosanitaria (ONPF) está actualmente recogida en la Norma internacional para medidas fitosanitarias (NIMF) 2 (<i>Marco para el análisis de riesgo de plagas</i> , adoptada en 1995 y revisada en 2007) y la NIMF 11 (<i>Análisis de riesgo de plagas para plagas cuarentenarias</i> , adoptada en 2001 y revisada en 2003, 2004 y 2013).	P	<p>Category : TRANSLATION (1521) Colombia (27 Sep 2023 6:05 PM) Se sugiere la siguiente traducción, teniendo en cuenta el texto de la versión en inglés "Pest risk analysis (PRA) is a core process within the scope of the IPPC"</p>
4	incluir todos requisitos de las etapas del ARP en una <u>única</u> -norma;	P	<p>Category : EDITORIAL (1522) Colombia (27 Sep 2023 6:07 PM) Se sugiere eliminar la palabra "única" debido a que en español es redundante y mantener solo la palabra "una", para estar en armonía con el texto en inglés.</p>
4	incluir todos <u>los</u> requisitos de las etapas del ARP en una única norma;	P	<p>Category : EDITORIAL (467) Dominican Republic (27 Jul 2023 7:52 PM)</p>
4	incluir todos requisitos de las etapas del ARP en una única norma;	C	<p>Category : EDITORIAL (466) Dominican Republic (27 Jul 2023 7:51 PM) los</p>
4	incluir todos <u>los</u> requisitos de las etapas del ARP en una única norma;	P	<p>Category : TRANSLATION (465) Nicaragua (27 Jul 2023 7:51 PM) Mejor comprensión</p>

4	incluir todos <u>los</u> requisitos de las etapas del ARP en una única norma;	P	<i>Category : EDITORIAL (464) OIRSA (27 Jul 2023 7:51 PM)</i>
6	La reorganización y revisión se llevaron a cabo <u>en consonancia de acuerdo</u> con la Especificación 72 (<i>Reorganización y revisión de las normas en materia de análisis del riesgo de plagas</i>) mediante la combinación en una sola norma y la revisión en caso necesario de la NIMF 2, la NIMF 11 y el proyecto de NIMF sobre <i>Manejo del riesgo de plagas para plagas cuarentenarias</i> (2014-001) (originalmente redactado como una norma independiente). Se eliminó el texto redundante y repetitivo, pero se mantuvo la orientación sustantiva. La información sobre los riesgos ambientales, los organismos vivos modificados (OMV) y el ARP para las plantas consideradas como plagas se agrupó en forma de anexos.	P	<i>Category : TRANSLATION (1523) Colombia (27 Sep 2023 6:09 PM)</i> Se sugiere cambiar el término "consonancia" por "acuerdo" para estar en armonía con el texto en inglés
9	<u>Cuerpo</u> - <u>Texto fundamental</u> de la norma	P	<i>Category : TRANSLATION (1525) Colombia (27 Sep 2023 6:11 PM)</i> Se sugiere cambiar el término "Cuerpo" por "Texto fundamental" para estar en armonía con el texto en inglés
16	APÉNDICE 1: <u>Gráfico</u> - <u>Diagrama de flujo</u> del análisis del riesgo de plagas	P	<i>Category : TRANSLATION (1528) Colombia (27 Sep 2023 6:13 PM)</i> Se sugiere cambiar el término "gráfico" por "diagrama de flujo" para estar en armonía con el texto en inglés
21	NOTA: Se <u>alienta</u> - <u>anima</u> a los revisores a <u>centrarse a examinar el centrar su examen</u> del texto nuevo y revisado (concretamente el texto en negro). Asimismo, se les anima a formular comentarios sobre el texto en rojo y azul en esta fase de la <u>consulta</u> , considerando que el alcance de la revisión está limitado por lo dispuesto en la Especificación 72 (). También se invita a los revisores a detectar problemas de aplicación, de haberlos.	P	<i>Category : TRANSLATION (1529) Colombia (27 Sep 2023 6:15 PM)</i> Para estar en armonía con el texto en inglés se sugiere cambiar "Se alienta" por "se anima" y "a centrarse a examinar" por "a centrar su examen"
30	PROYECTO REORGANIZACIÓN Y REVISIÓN DE LAS NORMAS EN MATERIA DE ANÁLISIS DEL RIESGO DE PLAGAS: Análisis del riesgo de plagas para plagas cuarentenarias (2020-001)	P	<i>Category : TRANSLATION (1724) Costa Rica (30 Sep 2023 4:12 AM)</i> Por consistencia con la versión en inglés.
30	PROYECTO DE REORGANIZACIÓN Y REVISIÓN DE LAS NORMAS EN MATERIA LA NORMATIVA DE ANÁLISIS DEL RIESGO DE PLAGAS: Análisis del riesgo de plagas para plagas cuarentenarias (2020-001)	P	<i>Category : TRANSLATION (1543) Colombia (27 Sep 2023 6:38 PM)</i> Para estar en armonía con el texto en inglés se sugiere cambiar "Proyecto reorganización" por "Proyecto de"

			reorganización" y eliminar las palabras "en materia de", así como reemplazar "Las normas" por "normativa" y eliminar las palabras "en materia de"
30	PROYECTO REORGANIZACIÓN Y REVISIÓN DE LAS NORMAS EN MATERIA DE ANÁLISIS DEL RIESGO DE PLAGAS: Análisis del riesgo de plagas para plagas cuarentenarias (2020-001)	P	<i>Category : TRANSLATION (934) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Por consistencia con la versión en inglés.
57	En la presente norma se <u>describen la estructura general y los conceptos en los que se basa-describe</u> el proceso de análisis del riesgo de plagas (ARP) para plagas <u>cuarentenarias en el ámbito de la CIPFcuarentenarias</u> . La norma abarca los procesos integrados de las tres etapas del ARP: inicio, evaluación del riesgo de plagas y manejo del riesgo de plagas. Asimismo, se abordan la incertidumbre, la recopilación de información, la documentación, la comunicación de los riesgos de plagas, la coherencia y la forma de evitar demoras indebidas. También se proporciona orientación específica sobre el análisis de los riesgos que presentan las plagas para el medio ambiente y la diversidad biológica, los riesgos de las plantas que son OVM y el ARP para plantas consideradas como plagas cuarentenarias.	P	<i>Category : TECHNICAL (1725) Costa Rica (30 Sep 2023 4:14 AM)</i> Para simplificar. Todas las NIMF entran en el ámbito de la CIPF
57	En la presente norma se <u>describen la estructura general y los conceptos en los que se basa-describe</u> el proceso de análisis del riesgo de plagas (ARP) para plagas <u>cuarentenarias en el ámbito de la CIPFcuarentenarias</u> . La norma abarca los procesos integrados de las tres etapas del ARP: inicio, evaluación del riesgo de plagas y manejo del riesgo de plagas. Asimismo, se abordan la incertidumbre, la recopilación de información, la documentación, la comunicación de los riesgos de plagas, la coherencia y la forma de evitar demoras indebidas. También se proporciona orientación específica sobre el análisis de los riesgos que presentan las plagas para el medio ambiente y la diversidad biológica, los riesgos de las plantas que son OVM y el ARP para plantas consideradas como plagas cuarentenarias.	P	<i>Category : TECHNICAL (935) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (21 ago 2023 12:04) Para simplificar. Todas las NIMF entran en el ámbito de la CIPF
58	En esta norma no se proporciona orientación sobre el <u>APR-ARP</u> para plagas no cuarentenarias reglamentadas, que se puede encontrar en la NIMF 21 (<i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i>).	P	<i>Category : TECHNICAL (1726) Costa Rica (30 Sep 2023 4:14 AM)</i> Uso correcto del término
58	En esta norma no se proporciona orientación sobre el <u>APR-ARP</u> para plagas no cuarentenarias reglamentadas, que se puede encontrar en la NIMF 21 (<i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i>).	P	<i>Category : TRANSLATION (1545) Colombia (27 Sep 2023 6:40 PM)</i> Reemplazar "APR" por "ARP"
58	En esta norma no se proporciona orientación sobre el <u>APR-ARP</u> para plagas no cuarentenarias reglamentadas, que se puede encontrar en la NIMF 21 (<i>Análisis de</i>	P	<i>Category : EDITORIAL (936) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i>

	<i>riesgo de plagas para plagas no cuarentenarias reglamentadas).</i>		
58	En esta norma no se proporciona orientación sobre el <u>APR-ARP</u> para plagas no cuarentenarias reglamentadas, que se puede encontrar en la NIMF 21 (<i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i>).	P	<i>Category : EDITORIAL (899) COSAVE (12 Sep 2023 9:47 PM)</i> Se corrige la digitación de la sigla ARP
58	En esta norma no se proporciona orientación sobre el <u>APR-ARP</u> para plagas no cuarentenarias reglamentadas, que se puede encontrar en la NIMF 21 (<i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i>).	P	<i>Category : TECHNICAL (473) Dominican Republic (27 Jul 2023 7:58 PM)</i> Para mejor entendimiento del texto
58	En esta norma no se proporciona orientación sobre el <u>APR-ARP</u> para plagas no cuarentenarias reglamentadas, que se puede encontrar en la NIMF 21 (<i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i>).	P	<i>Category : TECHNICAL (469) OIRSA (27 Jul 2023 7:56 PM)</i> uso correcto del término
58	En esta norma no se proporciona orientación sobre el <u>APR-ARP</u> para plagas no cuarentenarias reglamentadas, que se puede encontrar en la NIMF 21 (<i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i>).	P	<i>Category : TECHNICAL (468) Nicaragua (27 Jul 2023 7:56 PM)</i> Ordenamiento
68	Perfil de los requisitos	C	<i>Category : TECHNICAL (937) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (21 ago 2023 12:15) Dado que la sección "perfil de los requisitos" contiene un resumen del contenido de la NIMF, sugerimos integrar a esta sección la sección 1 "Marco para el ARP"
69	El ARP es <u>un instrumento apropiado para: detectar una herramienta de evaluación de evidencias biológicas y otras evidencias económicas para determinar</u> plagas y vías de <u>entrada y dispersión que puedan ser motivo de</u> preocupación en un área especificada y evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo <u>de plagas</u> detectado, a fin de reducir el riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.	P	<i>Category : TECHNICAL (1727) Costa Rica (30 Sep 2023 4:18 AM)</i> Redacción mas precisa, y para ajustar a la versión en inglés
69	El ARP es <u>un instrumento apropiado una herramienta de evaluación de evidencias científicas</u> para: detectar plagas y vías de <u>entrada y dispersión que puedan ser motivo de</u> preocupación <u>cuarentenaria</u> en un área especificada y evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo <u>de plagas</u> detectado, a fin de reducir el	P	<i>Category : TECHNICAL (938) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (21 ago 2023 12:12) Redacción mas precisa, y para ajustar a la versión en inglés

	riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.		
69	El ARP es un instrumento apropiado <u>para evaluar: detectar plagas y evidencias científicas, económicas, u otras para determinar plagas</u> , vías de entrada y dispersión que puedan ser motivo de preocupación en un área <u>especificada y especificada, así como para</u> evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo detectado, a fin de reducir el riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.	P	<p><i>Category : SUBSTANTIVE</i> (569) CA (12 Aug 2023 2:39 AM) El ARP es la justificación técnica por medio de la cual se determinan las medidas fitosanitarias a aplicarse para la mitigación del riesgo de plagas. Se utiliza la letra y de manera repetitiva</p>
69	El <u>ARP-análisis de riesgo de plaga (ARP)</u> es un instrumento apropiado para: <u>detectar determinar</u> plagas y vías de entrada y dispersión que puedan ser motivo de preocupación en un área especificada y evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo detectado, a fin de reducir el riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.	P	<p><i>Category : TECHNICAL</i> (478) Dominican Republic (27 Jul 2023 8:00 PM) Para mejor entendimiento</p>
69	El <u>ARP-análisis de riesgo de plagas (ARP)</u> es un instrumento apropiado para: detectar plagas y vías de entrada y dispersión que puedan ser motivo de preocupación en un área especificada y evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo detectado, a fin de reducir el riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.	P	<p><i>Category : TECHNICAL</i> (474) Nicaragua (27 Jul 2023 7:59 PM) Mujer comprensión del texto</p>
69	El <u>ARP-análisis de riesgo de plagas (ARP)</u> es un instrumento apropiado para: detectar plagas y vías de entrada y dispersión que puedan ser motivo de preocupación en un área especificada y evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del	P	<p><i>Category : TECHNICAL</i> (472) OIRSA (27 Jul 2023 7:58 PM) comprensión de la abreviatura</p>

	riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo detectado, a fin de reducir el riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.		
69	El ARP es un instrumento apropiado para: <u>detectar</u> <u>identificar</u> plagas y vías de entrada y dispersión que puedan ser motivo de preocupación en un área especificada y evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo detectado, a fin de reducir el riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.	P	<p><i>Category : TECHNICAL</i> (471) Nicaragua (27 Jul 2023 7:58 PM) Uso correcto del término</p>
69	El ARP es un instrumento apropiado para: <u>detectar</u> <u>identificar</u> plagas y vías de entrada y dispersión que puedan ser motivo de preocupación en un área especificada y evaluar el riesgo de plagas que entrañan; determinar las áreas en peligro y, si procede, establecer las opciones de manejo del riesgo de plagas y determinar las medidas fitosanitarias más apropiadas, proporcionales al riesgo detectado, a fin de reducir el riesgo de introducción y dispersión de las plagas de que se trate. El ARP para plagas cuarentenarias tiene tres etapas: 1: Inicio; 2: Evaluación del riesgo de plagas; 3: Manejo del riesgo de plagas.	P	<p><i>Category : TECHNICAL</i> (470) OIRSA (27 Jul 2023 7:58 PM) uso correcto de términos</p>
70	ANTECEDENTES	C	<p><i>Category : TECHNICAL</i> (1728) Costa Rica (30 Sep 2023 4:18 AM) Se notaron inconsistencias respecto a algunos términos, en éste párrafo se identificó por ejemplo, que sería adecuado cambiar la palabra "pruebas" por "evidencias"; cambiar "reglamentación" por "medidas fitosanitarias".</p> <p><i>Category : TECHNICAL</i></p>
71	El análisis de riesgo de plagas (ARP) brinda los fundamentos para las medidas fitosanitarias en un área del ARP especificada. En un ARP, se evalúan las pruebas científicas disponibles para determinar si un organismo es una plaga. En caso de que lo sea, el análisis evalúa la probabilidad de introducción y dispersión de la plaga en cuestión y la magnitud de las posibles consecuencias económicas en un área definida, utilizando datos biológicos u otros datos científicos y económicos.	C	<p><i>Category : TECHNICAL</i> (939) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se notaron inconsistencias respecto a algunos términos, en éste párrafo se identificó por ejemplo, que sería adecuado cambiar la palabra "pruebas" por "evidencias"; cambiar "reglamentación" por</p>

	Aunque para ciertos organismos se sabe de antemano que son plagas, en otros casos debe establecerse en primer término si constituyen o no una plaga. Si el riesgo de plagas se considera inaceptable, el análisis podrá continuar proponiendo opciones en materia de manejo del riesgo de plagas que puedan reducir el riesgo a un nivel aceptable. Posteriormente, dichas opciones de manejo del riesgo de plagas podrán ser utilizadas para establecer la reglamentación fitosanitaria pertinente.		"medidas fitosanitarias" .
71	El análisis de riesgo de plagas (ARP) brinda los fundamentos para <u>determinar</u> las medidas fitosanitarias en un área del ARP especificada. En un ARP, se evalúan las pruebas científicas disponibles para determinar si un organismo es una plaga. En caso de que lo sea, el análisis evalúa la probabilidad de introducción y dispersión de la plaga en cuestión y la magnitud de las posibles consecuencias económicas en un área definida, utilizando datos biológicos u otros datos científicos y económicos. Aunque para ciertos organismos se sabe de antemano que son plagas, en otros casos debe establecerse en primer término si constituyen o no una plaga. Si el riesgo de plagas se considera inaceptable, el análisis podrá continuar proponiendo opciones en materia de manejo del riesgo de plagas que puedan reducir el riesgo a un nivel aceptable. Posteriormente, dichas opciones de manejo del riesgo de plagas podrán ser utilizadas para establecer la reglamentación fitosanitaria pertinente.	P	<i>Category : TECHNICAL (477) Guatemala (27 Jul 2023 8:00 PM)</i>
71	El análisis de riesgo de plagas (ARP) brinda los fundamentos para <u>determinar</u> las medidas fitosanitarias en un área del ARP especificada. En un ARP, se evalúan las pruebas científicas disponibles para determinar si un organismo es una plaga. En caso de que lo sea, el análisis evalúa la probabilidad de introducción y dispersión de la plaga en cuestión y la magnitud de las posibles consecuencias económicas en un área definida, utilizando datos biológicos u otros datos científicos y económicos. Aunque para ciertos organismos se sabe de antemano que son plagas, en otros casos debe establecerse en primer término si constituyen o no una plaga. Si el riesgo de plagas se considera inaceptable, el análisis podrá continuar proponiendo opciones en materia de manejo del riesgo de plagas que puedan reducir el riesgo a un nivel aceptable. Posteriormente, dichas opciones de manejo del riesgo de plagas podrán ser utilizadas para establecer la reglamentación fitosanitaria pertinente.	P	<i>Category : TECHNICAL (476) Nicaragua (27 Jul 2023 8:00 PM) Mejor comprensión del texto</i>
71	El análisis de riesgo de plagas (ARP) brinda los fundamentos para <u>determinar</u> las medidas fitosanitarias en un área del ARP especificada. En un ARP, se evalúan las	P	<i>Category : TECHNICAL (475) OIRSA (27 Jul 2023 7:59 PM) uso correcto de términos</i>

	<p>pruebas científicas disponibles para determinar si un organismo es una plaga. En caso de que lo sea, el análisis evalúa la probabilidad de introducción y dispersión de la plaga en cuestión y la magnitud de las posibles consecuencias económicas en un área definida, utilizando datos biológicos u otros datos científicos y económicos. Aunque para ciertos organismos se sabe de antemano que son plagas, en otros casos debe establecerse en primer término si constituyen o no una plaga. Si el riesgo de plagas se considera inaceptable, el análisis podrá continuar proponiendo opciones en materia de manejo del riesgo de plagas que puedan reducir el riesgo a un nivel aceptable. Posteriormente, dichas opciones de manejo del riesgo de plagas podrán ser utilizadas para establecer la reglamentación fitosanitaria pertinente.</p>		
73	<p>En casos menos frecuentes, el producto básico en sí puede <u>constituir representar</u> riesgo de plaga. Cuando organismos importados como productos básicos (por ejemplo, plantas para plantar, agentes de control biológico y otros organismos benéficos) u organismos vivos modificados se introducen deliberadamente y se establecen en hábitat en áreas nuevas, puede existir el riesgo de que se difundan accidentalmente en hábitats no previstos y causen allí daños a plantas y a productos vegetales. Tales riesgos también podrán analizarse utilizando el proceso de ARP.</p>	P	<p>Category : TECHNICAL (480) Dominican Republic (27 Jul 2023 8:02 PM) mejor entendimiento</p>
73	<p>En casos menos frecuentes, el producto básico en sí puede <u>constituir representar un</u> riesgo de plaga. Cuando organismos importados como productos básicos (por ejemplo, plantas para plantar, agentes de control biológico y otros organismos benéficos) u organismos vivos modificados se introducen deliberadamente y se establecen en hábitat en áreas nuevas, puede existir el riesgo de que se difundan accidentalmente en hábitats no previstos y causen allí daños a plantas y a productos vegetales. Tales riesgos también podrán analizarse utilizando el proceso de ARP.</p>	P	<p>Category : TECHNICAL (479) OIRSA (27 Jul 2023 8:02 PM) mejor redacción del párrafo</p>
76	<p>Los principios <u>básicos</u> de necesidad, riesgo manejado, impacto mínimo, transparencia, armonización, no discriminación, justificación técnica, cooperación y equivalencia, descritos en la NIMF 1 (<i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>) y el Acuerdo de la Organización Mundial del Comercio (OMC) sobre la aplicación de medidas sanitarias y fitosanitarias (Acuerdo MSF) (OMC, 1994), son consideraciones esenciales en el ARP.</p>	P	<p>Category : TECHNICAL (1729) Costa Rica (30 Sep 2023 4:19 AM) Concordancia con la NIMF 1</p>
76	<p>Los principios <u>básicos</u> de necesidad, riesgo manejado, impacto mínimo, transparencia, armonización, no discriminación, justificación técnica, cooperación</p>	P	<p>Category : TECHNICAL (482) Dominican Republic (27 Jul 2023 8:04 PM)</p>

	y equivalencia, descritos en la NIMF 1 (<i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>) y el Acuerdo de la Organización Mundial del Comercio (OMC) sobre la aplicación de medidas sanitarias y fitosanitarias (Acuerdo MSF) (OMC, 1994), son consideraciones esenciales en el ARP.		
76	Los principios <u>básicos</u> de necesidad, riesgo manejado, impacto mínimo, transparencia, armonización, no discriminación, justificación técnica, cooperación y equivalencia, descritos en la NIMF 1 (<i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>) y el Acuerdo de la Organización Mundial del Comercio (OMC) sobre la aplicación de medidas sanitarias y fitosanitarias (Acuerdo MSF) (OMC, 1994), son consideraciones esenciales en el ARP.	P	<p>Category : TECHNICAL (481) OIRSA (27 Jul 2023 8:03 PM) uso correcto de término</p>
78	<u>El proceso comprende el análisis de los riesgos que presentan las plagas para la biodiversidad y el medio ambiente. Las medidas fitosanitarias resultantes podrán ayudar a proteger el medio ambiente y a conservar la biodiversidad, ya que permiten manejar el riesgo de plagas de los productos que se mueven a escala internacional y evitar al mismo tiempo las acciones fitosanitarias que no están técnicamente justificadas.</u> <u>En la norma se proporciona orientación sobre la forma de determinar si una plaga cumple los criterios para ser considerada una plaga cuarentenaria y las opciones de manejo del riesgo a fin de gestionar el riesgo de plagas asociado. Para determinar estas opciones, que se elaboran en proporción al riesgo, se tiene en cuenta el grado de incertidumbre.</u> <u>El proceso comprende el análisis de los riesgos que presentan las plagas para la biodiversidad y el medio ambiente. Las medidas fitosanitarias resultantes podrán ayudar a proteger el medio ambiente y a conservar la biodiversidad, ya que permiten manejar el riesgo de plagas de los productos que se mueven a escala internacional y evitar al mismo tiempo las acciones fitosanitarias que no están técnicamente justificadas.</u>	P	<p>Category : TECHNICAL (1730) Costa Rica (30 Sep 2023 4:20 AM) Se elimina el texto por que no corresponde muy bien con el titulo de la sección, es mas apropiado como parte del ámbito</p>
78	En la norma se proporciona orientación sobre la forma de determinar si <u>una plaga un organismo</u> cumple los criterios para ser considerada una plaga cuarentenaria y las opciones de manejo del riesgo a fin de gestionar el riesgo de plagas asociado. Para determinar estas opciones, que se elaboran en proporción al riesgo, se tiene en cuenta el grado de incertidumbre. El proceso comprende el análisis de los riesgos que presentan las plagas para la biodiversidad y el medio ambiente. Las medidas fitosanitarias resultantes podrán ayudar a proteger el medio ambiente y a conservar	P	<p>Category : TECHNICAL (485) Nicaragua (27 Jul 2023 8:11 PM) Término más apropiado</p>

	la biodiversidad, ya que permiten manejar el riesgo de plagas de los productos que se mueven a escala internacional y evitar al mismo tiempo las acciones fitosanitarias que no están técnicamente justificadas.		
78	En la norma se proporciona orientación sobre la forma de determinar si <u>una plaga unun organismo</u> cumple los criterios para ser considerada una plaga cuarentenaria y las opciones de manejo del riesgo a fin de gestionar el riesgo de plagas asociado. Para determinar estas opciones, que se elaboran en proporción al riesgo, se tiene en cuenta el grado de incertidumbre. El proceso comprende el análisis de los riesgos que presentan las plagas para la biodiversidad y el medio ambiente. Las medidas fitosanitarias resultantes podrán ayudar a proteger el medio ambiente y a conservar la biodiversidad, ya que permiten manejar el riesgo de plagas de los productos que se mueven a escala internacional y evitar al mismo tiempo las acciones fitosanitarias que no están técnicamente justificadas.	P	<i>Category : TECHNICAL (484) Guatemala (27 Jul 2023 8:09 PM)</i> el uso correcto es organismo no siempre va ser una plaga
78	En la norma se proporciona orientación sobre la forma de determinar si <u>una plaga un organismo</u> cumple los criterios para ser considerada una plaga cuarentenaria y las opciones de manejo del riesgo a fin de gestionar el riesgo de plagas asociado. Para determinar estas opciones, que se elaboran en proporción al riesgo, se tiene en cuenta el grado de incertidumbre. El proceso comprende el análisis de los riesgos que presentan las plagas para la biodiversidad y el medio ambiente. Las medidas fitosanitarias resultantes podrán ayudar a proteger el medio ambiente y a conservar la biodiversidad, ya que permiten manejar el riesgo de plagas de los productos que se mueven a escala internacional y evitar al mismo tiempo las acciones fitosanitarias que no están técnicamente justificadas.	P	<i>Category : TECHNICAL (483) OIRSA (27 Jul 2023 8:05 PM)</i> uso correcto de término
80	1. Marco para el ARP	C	<i>Category : TECHNICAL (940) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (21 ago 2023 12:26) Se sugiere incluir toda esta sección en la sección "perfil de los requisitos" dado que es un resumen del contenido de la norma
81	El proceso de ARP podrá utilizarse en el caso de los organismos que no han sido reconocidos previamente como plagas (sean estos plantas, agentes de control biológico y otros organismos benéficos y OVM), plagas reconocidas y vías, y en el examen de las políticas fitosanitarias. El proceso <u>de ARP consta de tres etapas que se puede-pueden</u> resumir de la siguiente forma:	P	<i>Category : TECHNICAL (941) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (21 ago 2023 12:27) Para clarificar
82	<u>El proceso de ARP se inicia en la Etapa 41 (inicio)</u> , que consiste en identificar la	P	<i>Category : EDITORIAL</i>

	plaga o plagas y las vías que pueden ser motivo de preocupación y que deberían considerarse para la evaluación del riesgo de plagas en relación con el área determinada para el ARP. Si no se identifican plagas en esta etapa, el análisis se podrá detener.		(1731) Costa Rica (30 Sep 2023 4:21 AM) consistencia con los demás etapas
82	El proceso de ARP se inicia en la La Etapa <u>1 (inicio)</u> , que consiste en identificar la plaga o plagas y las vías que pueden ser motivo de preocupación y que deberían considerarse para la evaluación del riesgo de plagas en relación con el área determinada para el ARP. Si no se identifican plagas en esta etapa, el análisis se podrá detener.	P	<i>Category : EDITORIAL</i> (942) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) OIRSA (15 ago 2023 7:58) En consistencia con las demás etapas
82	El proceso de ARP se inicia en la La Etapa <u>1, que 1 (inicio)</u> consiste en identificar la plaga o plagas y las vías que pueden ser motivo de preocupación y que deberían considerarse para la evaluación del riesgo de plagas en relación con el área determinada para el ARP. Si no se identifican plagas en esta etapa, el análisis se podrá detener.	P	<i>Category : TECHNICAL</i> (489) Dominican Republic (27 Jul 2023 8:21 PM)
82	La El proceso de ARP se inicia en la Etapa <u>1, que 1 (inicio)</u> consiste en identificar la plaga o plagas y las vías que pueden ser motivo de preocupación y que deberían considerarse para la evaluación del riesgo de plagas en relación con el área determinada para el ARP. Si no se identifican plagas en esta etapa, el análisis se podrá detener.	P	<i>Category : EDITORIAL</i> (488) OIRSA (27 Jul 2023 8:21 PM) en consistencia con las demás etapas
82	La El proceso de ARP se inicia en la Etapa <u>1, que 1 (inicio)</u> , consiste en identificar la plaga o plagas y las vías que pueden ser motivo de preocupación y que deberían considerarse para la evaluación del riesgo de plagas en relación con el área determinada para el ARP. Si no se identifican plagas en esta etapa, el análisis se podrá detener.	P	<i>Category : TECHNICAL</i> (487) Nicaragua (27 Jul 2023 8:21 PM) Mejor comprensión del texto
82	El proceso de ARP se inicia en la La Etapa <u>1, que consiste:</u> Consiste en identificar la plaga o plagas y las vías que pueden ser motivo de preocupación y que deberían considerarse para la evaluación del riesgo de plagas en relación con el área determinada para el ARP. Si no se identifican plagas en esta etapa, el análisis se podrá detener.	P	<i>Category : TECHNICAL</i> (486) Guatemala (27 Jul 2023 8:20 PM)
83	La Etapa 2 (evaluación del riesgo de plagas) comienza con la categorización de las plagas a fin de determinar si cumplen los criterios para considerarlas plagas cuarentenarias. Si no se cumplen los criterios, el análisis se podrá detener. La evaluación del riesgo de plagas prosigue con una evaluación de la probabilidad de entrada, establecimiento y dispersión de la plaga y de sus posibles	P	<i>Category : TECHNICAL</i> (1732) Costa Rica (30 Sep 2023 4:22 AM) Ver comentario general

	<u>consecuencias consecuencias económicas.</u>	
83	La Etapa 2 (evaluación del riesgo de plagas) comienza con la categorización de las plagas a fin de determinar si cumplen los criterios para considerarlas plagas cuarentenarias. Si no se cumplen los criterios, el análisis se podrá detener. La evaluación del riesgo de plagas prosigue con una evaluación de la probabilidad de entrada, establecimiento y dispersión de la plaga y de sus posibles <u>consecuencias consecuencias económicas.</u>	P <i>Category : TECHNICAL (943) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (21 ago 2023 12:31) Ver comentario general</i>
84	La Etapa 3 (manejo del riesgo de plagas) consiste en identificar, evaluar y seleccionar las <u>medidas fitosanitarias opciones de manejo de riesgo</u> apropiadas <u>y justificadas</u> para reducir el riesgo de plagas que presentan las plagas cuarentenarias identificadas en la Etapa 2.	P <i>Category : TECHNICAL (944) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (21 ago 2023 12:33) Por consistencia OIRSA (15 ago 2023 7:59) dar mayor claridad a las medidas fitosanitarias a aplicar</i>
84	La Etapa 3 (manejo del riesgo de plagas) consiste en identificar, evaluar y seleccionar las medidas fitosanitarias apropiadas <u>y justificadas</u> para reducir el riesgo de plagas que presentan las plagas cuarentenarias identificadas en la Etapa 2.	P <i>Category : TECHNICAL (492) Nicaragua (27 Jul 2023 8:26 PM) Brindar mejor aplicabilidad de la norma</i>
84	La Etapa 3 (manejo del riesgo de plagas) consiste en identificar, evaluar y seleccionar las medidas fitosanitarias apropiadas <u>y justificado</u> para reducir el riesgo de plagas que presentan las plagas cuarentenarias identificadas en la Etapa 2.	P <i>Category : EDITORIAL (491) Dominican Republic (27 Jul 2023 8:26 PM)</i>
84	La Etapa 3 (manejo del riesgo de plagas) consiste en identificar, evaluar y seleccionar las medidas fitosanitarias apropiadas <u>y justificadas</u> para reducir el riesgo de plagas que presentan las plagas cuarentenarias identificadas en la Etapa 2.	P <i>Category : TECHNICAL (490) OIRSA (27 Jul 2023 8:24 PM) dar mayor claridad a las medidas fitosanitarias a aplicar</i>
89	2. Aspectos comunes a todas las etapas del ARP	C <i>Category : TECHNICAL (1733) Costa Rica (30 Sep 2023 4:23 AM) Respecto a la palabra "lagunas", no es un término comúnmente utilizado. Se sugiere se reemplace por el término "vacíos". y ajustar le término a los de la NIMF 5, por ejemplo encuesta por prospección</i>
90	2.1 Recopilación de información	C <i>Category : TECHNICAL (945) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (21 ago 2023 12:35) De acuerdo con el comentario general sugerimos integrar en esta sección la sección 2 del Anexo 4</i>

91	Durante todo el proceso se debería recolectar y analizar la información que se necesite para llegar a formular recomendaciones y conclusiones. Podrán ser de interés publicaciones científicas e información técnica como, por ejemplo, datos relativos a encuestas o intercepciones. A medida que avance el análisis, se podrán identificar <u>lagunas-vacíos</u> de información que requieran estudios o investigación adicionales. Cuando falte información o cuando esta no sea concluyente, se podrá utilizar la opinión de expertos, de ser apropiado.	P	<p><i>Category : EDITORIAL (1547) Colombia (27 Sep 2023 6:41 PM)</i></p> <p>Para estar en armonía con el texto en inglés, se sugiere cambiar la palabra "lagunas" por "vacíos"</p>
91	Durante todo el proceso se debería recolectar y analizar la información que se necesite para llegar a formular recomendaciones y conclusiones. Podrán ser de interés publicaciones científicas e información técnica como, por ejemplo, datos relativos a encuestas o intercepciones. A medida que avance el análisis, se podrán identificar <u>lagunas</u> de información que requieran estudios o investigación adicionales. Cuando falte información o cuando esta no sea concluyente, se podrá utilizar la opinión de expertos, de ser apropiado.	C	<p><i>Category : TRANSLATION (946) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i></p> <p>Respecto a la palabra "lagunas", no es un término comúnmente utilizado. Se sugiere se reemplace por el término "vacíos".</p>
91	Durante todo el proceso se debería recolectar y analizar la información que se necesite para llegar a formular recomendaciones y conclusiones. Podrán ser de interés publicaciones científicas e información técnica como, por ejemplo, datos relativos a <u>eneuestas-prospección</u> o intercepciones. A medida que avance el análisis, se podrán identificar lagunas de información que requieran estudios o investigación adicionales. Cuando falte información o cuando esta no sea concluyente, se podrá utilizar la opinión de expertos, de ser apropiado.	P	<p><i>Category : TECHNICAL (497) Dominican Republic (27 Jul 2023 8:28 PM)</i></p> <p>Revisar de acuerdo a los términos de la NIMF 5</p>
91	Durante todo el proceso se debería recolectar y analizar la información que se necesite para llegar a formular recomendaciones y conclusiones. Podrán ser de interés publicaciones científicas e información técnica como, por ejemplo, datos relativos a <u>eneuestas-prospecciones</u> o intercepciones. A medida que avance el análisis, se podrán identificar lagunas de información que requieran estudios o investigación adicionales. Cuando falte información o cuando esta no sea concluyente, se podrá utilizar la opinión de expertos, de ser apropiado.	P	<p><i>Category : TECHNICAL (495) Nicaragua (27 Jul 2023 8:27 PM)</i></p> <p>Término utilizado conforme la NIMF 5</p>
91	Durante todo el proceso se debería recolectar y analizar la información que se necesite para llegar a formular recomendaciones y conclusiones. Podrán ser de interés publicaciones científicas e información técnica como, por ejemplo, datos relativos a <u>eneuestas-prospección</u> o intercepciones. A medida que avance el análisis, se podrán identificar lagunas de información que requieran estudios o investigación adicionales. Cuando falte información o cuando esta no sea concluyente, se podrá utilizar la opinión de expertos, de ser apropiado.	P	<p><i>Category : TECHNICAL (493) OIRSA (27 Jul 2023 8:26 PM)</i></p> <p>en concordancia con la NIMF 5</p>

	concluyente, se podrá utilizar la opinión de expertos, de ser apropiado.		
94	La incertidumbre es un componente del riesgo y es, por consiguiente, importante reconocerla y documentarla al realizar los ARP. Las fuentes de incertidumbre en un ARP particular podrán incluir: la falta de datos o los datos incompletos, incoherentes o contradictorios; la <u>actualización taxonómica de las plagas</u> ; la variabilidad natural de los sistemas biológicos; la subjetividad del análisis, y la aleatoriedad del muestreo. Podrán presentar desafíos particulares los síntomas de causas y origen inciertos y los portadores asintomáticos de plagas.	P	<p><i>Category : TECHNICAL (1549) Colombia (27 Sep 2023 6:42 PM)</i></p> <p>Incluir " la actualización taxonómica de las plagas" como un ejemplo de las fuentes de incertidumbre.</p>
114	<u>las pruebas los soportes</u> de las repercusiones económicas, incluido el impacto ambiental;	P	<p><i>Category : TECHNICAL (1551) Colombia (27 Sep 2023 6:43 PM)</i></p> <p>Se sugiere cambiar la palabra "pruebas" por el término "soportes" tanto en inglés como en español para dar mayor confiabilidad al mecanismo de validación de la evidencia del impacto económico y ambiental</p>
120	<u>cualquierla</u> necesidad particular de monitorear la eficacia de las medidas fitosanitarias que se proponen;	P	<p><i>Category : TRANSLATION (1552) Colombia (27 Sep 2023 6:44 PM)</i></p> <p>Para estar en armonía con el texto en inglés, se sugiere cambiar la palabra "la" por "cualquier".</p>
120	<u>la</u> necesidad particular de monitorear la eficacia de las medidas fitosanitarias que se proponen;	C	<p><i>Category : TRANSLATION (947) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i></p> <p>Para estar en armonía con el texto en inglés, se sugiere cambiar la palabra "la" por "cualquier".</p>
126	crear opciones <u>convincientes-efectivas</u> para el manejo del riesgo de plagas;	P	<p><i>Category : EDITORIAL (565) CA (12 Aug 2023 2:28 AM)</i></p> <p>Convinciente se refiere a argumentar para que se piense de una forma determinada, sería mejor utilizar la palabra efectiva</p>
127	elaborar <u>reglamentos-regulaciones</u> y políticas creíbles y coherentes para abordar los riesgos de plagas;	P	<p><i>Category : TRANSLATION (1553) Colombia (27 Sep 2023 6:45 PM)</i></p> <p>Para estar en armonía con el texto en inglés y dentro del contexto regulatorio, se sugiere cambiar la palabra "reglamentos" por "regulaciones".</p>
127	elaborar <u>reglamentos</u> y políticas creíbles y coherentes para abordar los riesgos de plagas;	C	<p><i>Category : TRANSLATION (948) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i></p>

			America (18 Sep 2023 8:25 PM) Para estar en armonía con el texto en inglés y dentro del contexto regulatorio, se sugiere cambiar la palabra "reglamentos" por "regulaciones".
130	Si después del ARP se adoptan requisitos de importación o prohibiciones <u>fitosanitarios</u> <u>fitosanitarias</u> , la parte contratante los publicará de inmediato e informará a las partes contratantes que en su opinión puedan verse directamente afectadas por ellos (de conformidad con el artículo VII.2 b) de la CIPF), y pondrá a disposición de <u>cualesquier partes contratantes</u> <u>cualquier parte contratante que lo</u> soliciten el fundamento de dichos requisitos o prohibiciones (de conformidad con el artículo VII.2 c) de la CIPF).	P	Category : TRANSLATION (1554) Colombia (27 Sep 2023 6:47 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar la palabra "fitosanitarios" por "fitosanitarias" y las palabras "cualesquier partes contratantes" por "cualquier parte contratante".
131	Si después del ARP no se adoptan requisitos ni prohibiciones <u>fitosanitarios</u> <u>fitosanitarias</u> , las partes contratantes podrán poner a disposición esta información.	P	Category : TRANSLATION (1555) Colombia (27 Sep 2023 6:48 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar la palabra "fitosanitarios" por "fitosanitarias"
139	La coherencia puede asegurarse, por ejemplo, mediante la elaboración de criterios genéricos de decisión y etapas de procedimiento unificadas, la capacitación de quienes realicen los ARP y <u>el examen</u> <u>la revisión</u> de los proyectos de ARP.	P	Category : TRANSLATION (1556) Colombia (27 Sep 2023 6:49 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "el examen" por "la revisión".
139	La coherencia puede asegurarse, por ejemplo, mediante la elaboración de criterios genéricos de decisión y etapas de procedimiento unificadas, la capacitación de quienes realicen los ARP y <u>el examen</u> de los proyectos de ARP.	C	Category : TRANSLATION (949) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "el examen" por "la revisión".
141	Cuando otras partes contratantes se vean afectadas directamente por el resultado de un ARP, la ONPF que haya llevado a cabo el ARP debería, <u>de solicitársele</u> <u>previa solicitud</u> , suministrar información sobre la terminación del análisis e indicar, si es posible, el marco temporal previsto teniendo en cuenta la necesidad de evitar demoras indebidas (véase la NIMF 1).	P	Category : TRANSLATION (1557) Colombia (27 Sep 2023 6:50 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "debería, de solicitársele" por "debe, previa solicitud".
142	3. Ámbito de aplicación del Aspectos específicos a considerar en el ARP	P	Category : TECHNICAL (1734) Costa Rica (30 Sep 2023 4:26 AM) Se sugiere otro título para poder incluir mejor los items siguientes y para evitar confusión con el ámbito de la norma.

142	3. Ámbito de aplicación del ARP	C	<i>Category : TECHNICAL (951) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (21 ago 2023 1:03) Se sugiere integrar esta sección en la sección de antecedentes</i>
142	3. Ámbito de aplicación del <u>Aspectos específicos a considerar en el ARP</u>	P	<i>Category : TECHNICAL (950) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se sugiere otro título para poder incluir mejor los items siguientes y para evitar confusión con el ámbito de la norma.</i>
143	<u>La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. También podrán considerarse plagas las plagas que afectan indirectamente a las plantas cultivadas, las plagas que afectan a plantas no cultivadas, los OVM y las plantas consideradas como plagas.</u>	P	<i>Category : TECHNICAL (1735) Costa Rica (30 Sep 2023 4:27 AM) Incluirlo en la sección de antecedentes</i>
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. También podrán considerarse plagas <u>las plagas aquellas</u> que afectan indirectamente a las plantas cultivadas, las plagas que afectan a plantas no cultivadas, los OVM y las plantas consideradas como plagas.	P	<i>Category : EDITORIAL (1559) Colombia (27 Sep 2023 6:52 PM) Sobra la palabra plagas: También podrán considerarse plagas las plagas que afectan</i>
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. <u>También podrán considerarse Las plagas las plagas también pueden incluir aquellas</u> que afectan indirectamente a las plantas cultivadas, las plagas que afectan a plantas no cultivadas, los OVM y las plantas consideradas como plagas.	P	<i>Category : EDITORIAL (952) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Sugerencias para mejorar la redacción.</i>
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. También podrán considerarse plagas <u>las plagas aquellas</u> que afectan indirectamente a las plantas cultivadas, las plagas que afectan a plantas no cultivadas, los OVM y las plantas consideradas como plagas.	P	<i>Category : EDITORIAL (902) COSAVE (12 Sep 2023 9:53 PM) Para evitar redundancias se sugiere reemplazar la segunda palabra "plagas" por "aquellas"</i>
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. <u>También podrán considerarse Las plagas también pueden incluir</u> las plagas que afectan indirectamente a las plantas cultivadas, las plagas que afectan a plantas no cultivadas, los OVM y las plantas consideradas como plagas.	P	<i>Category : EDITORIAL (901) COSAVE (12 Sep 2023 9:52 PM) Sugerencias para mejorar la redacción.</i>
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. También podrán considerarse plagas las plagas que afectan indirectamente a las plantas cultivadas, las plagas que afectan a	C	<i>Category : TECHNICAL (501) Dominican Republic (27 Jul 2023 8:33 PM) Para mejor entendimiento del párrafo</i>

	plantas no cultivadas, los OVM y las plantas consideradas como plagas.		
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. También podrán considerarse Las plagas las también pueden incluir plagas que afectan indirectamente a las plantas cultivadas, las-a plagas que afectan a plantas no cultivadas, los OVM y las plantas consideradas como plagas.	P	Category : TECHNICAL (500) OIRSA (27 Jul 2023 8:31 PM) redacción correcta del párrafo
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. También podrán considerarse plagas las plagas que afectan indirectamente a las plantas cultivadas, las plagas que afectan a plantas no cultivadas, los OVM <u>como plagas</u> y <u>las</u> plantas consideradas como <u>plagas malas hierbas o parásitos</u> .	P	Category : TECHNICAL (499) Guatemala (27 Jul 2023 8:30 PM)
143	La variedad de plagas que abarca la CIPF va más allá de las plagas que afectan directamente a las plantas cultivadas. También podrán considerarse plagas <u>las</u> <u>plagas-los organismos</u> que afectan indirectamente a las plantas cultivadas, las plagas que afectan a plantas no cultivadas, los OVM y las plantas consideradas como plagas.	P	Category : EDITORIAL (498) Guatemala (27 Jul 2023 8:29 PM)
144	3.1 Riesgos ambientales	C	Category : TECHNICAL (953) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (21 ago 2023 1:04) De acuerdo con el comentario general sugerimos integrar en el punto 3.1 la sección de Introducción del Anexo 4
145	<u>La CIPF abarca la protección de las plantas silvestres y cultivadas. Por consiguiente, las plagas que afectan, directa o indirectamente, a todos los tipos de plantas se encuentran dentro del ámbito de la CIPF. La información relativa al ámbito de la CIPF con respecto a los riesgos ambientales se proporciona en el Anexo 4.</u>	P	Category : TECHNICAL (1736) Costa Rica (30 Sep 2023 4:28 AM) integrar en el punto 3.1 la sección de Introducción del Anexo 4
147	<u>Esta norma se refiere generalmente a las características fenotípicas en vez de las genotípicas. Sin embargo, estas últimas se podrán considerar al evaluar los riesgos de plagas de los OVM. En el Anexo 5 se proporciona información relativa al ámbito de la CIPF en lo que respecta al ARP para los OVM, junto con los factores que se deberán considerar al determinar la posibilidad de que un OVM se convierta en una plaga. La presente norma se ocupa por lo general de las características fenotípicas en vez de las genotípicas. Sin embargo, estas últimas se podrán</u>	P	Category : TRANSLATION (1624) Colombia (27 Sep 2023 10:02 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "la presente" por "Esta" y "ocupa por lo general" por "se refiere generalmente a".

	<p>considerar al evaluar los riesgos de plagas de los OVM. En el Anexo 5 se proporciona información relativa al ámbito de la CIPF en lo que respecta al ARP para los OVM, junto con los factores que se deberán considerar al determinar la posibilidad de que un OVM se convierta en una plaga.</p>		
147	<p>Esta norma se refiere generalmente a las características fenotípicas en vez de las genotípicas. Sin embargo, estas últimas se podrán considerar al evaluar los riesgos de plagas de los OVM. En el Anexo 5 se proporciona información relativa al ámbito de la CIPF en lo que respecta al ARP para los OVM, junto con los factores que se deberán considerar al determinar la posibilidad de que un OVM se convierta en una plaga. La presente norma se ocupa por lo general de las características fenotípicas en vez de las genotípicas. Sin embargo, estas últimas se podrán considerar al evaluar los riesgos de plagas de los OVM. En el Anexo 5 se proporciona información relativa al ámbito de la CIPF en lo que respecta al ARP para los OVM, junto con los factores que se deberán considerar al determinar la posibilidad de que un OVM se convierta en una plaga.</p>	P	<p><i>Category : TRANSLATION</i> (954) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Para estar en armonía con el texto en inglés</p>
147	<p>Esta norma refiere generalmente a las características fenotípicas en vez de las genotípicas. Sin embargo, estas últimas se podrán considerar al evaluar los riesgos de plagas de los OVM. En el Anexo 5 se proporciona información relativa al ámbito de la CIPF en lo que respecta al ARP para los OVM, junto con los factores que se deberán considerar al determinar la posibilidad de que un OVM se convierta en una plaga. La presente norma se ocupa por lo general de las características fenotípicas en vez de las genotípicas. Sin embargo, estas últimas se podrán considerar al evaluar los riesgos de plagas de los OVM. En el Anexo 5 se proporciona información relativa al ámbito de la CIPF en lo que respecta al ARP para los OVM, junto con los factores que se deberán considerar al determinar la posibilidad de que un OVM se convierta en una plaga.</p>	P	<p><i>Category : TRANSLATION</i> (903) COSAVE (12 Sep 2023 9:55 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "la presente" por "Esta" y "ocupa por lo general" por "se refiere generalmente a".</p>
168	<p>Cuando el proceso de ARP haya iniciado como consecuencia de una solicitud de examinar una vía, antes de realizar las fases mencionadas se ha de elaborar una lista de los organismos que puede ser importante reglamentar de posible interés regulatorio, por su probable asociación con una vía.</p>	P	<p><i>Category : TRANSLATION</i> (1625) Colombia (27 Sep 2023 10:10 PM) Para estar en armonía con el texto en inglés y dentro del contexto regulatorio, se sugiere cambiar la frase "que puede ser importante reglamentar" por "de posible interés regulatorio".</p>
168	<p>Cuando el proceso de ARP haya iniciado como consecuencia de una solicitud de examinar una vía, antes de realizar las fases mencionadas se ha de elaborar una lista de los organismos que puede ser importante reglamentar por su probable</p>	C	<p><i>Category : TRANSLATION</i> (955) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p>

	asociación con una vía.		Colombia (17 ago 2023 10:14) Para estar en armonía con el texto en inglés y dentro del contexto regulatorio, se sugiere cambiar la frase "que puede ser importante reglamentar" por "de posible interés regulatorio".
169	Durante esta etapa, es preciso disponer de información para identificar el organismo y sus repercusiones económicas potenciales, que comprenden las ambientales ² . Otro tipo de información útil sobre el organismo podrá incluir su distribución geográfica, las plantas hospedantes, los hábitats y su relación con los productos. En el caso de las vías es esencial la información sobre el producto básico , incluso sobre los medios de transporte y el uso <u>destinado previsto</u> .	P	Category : TECHNICAL (1737) Costa Rica (30 Sep 2023 4:30 AM) Terminos correctos
169	Durante esta etapa, es preciso disponer de información para identificar el organismo y sus repercusiones económicas potenciales, que comprenden las ambientales ² . Otro tipo de información útil sobre el organismo podrá incluir su distribución geográfica, las plantas hospedantes, los hábitats y su relación con los productos. En el caso de las vías es esencial la información sobre el producto básico, incluso sobre los medios de transporte y el uso destinado.	C	Category : TRANSLATION (957) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Peru (21 ago 2023 1:09) "Proposed use" debe traducirse a "uso previsto", en concordancia a la NIMF 5
169	Durante esta etapa, es preciso disponer de información para identificar el organismo y sus repercusiones económicas potenciales, que comprenden las ambientales ² . Otro tipo de información útil sobre el organismo podrá incluir su distribución geográfica, las plantas hospedantes, los hábitats y su relación con los productos. En el caso de las vías es esencial la información sobre el producto básico, incluso sobre los medios de transporte y el uso destinado.	C	Category : TRANSLATION (956) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (21 ago 2023 8:00) "Commodity" debe traducirse como "producto", de acuerdo con la NIMF5
174	se propone importar un producto básico que no se ha importado previamente o un producto básico proveniente de un área de origen nueva;	C	Category : TRANSLATION (958) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (21 ago 2023 7:47) "Commodity" debe traducirse como "producto", de acuerdo con la NIMF5
177	se identifica un cambio en la <u>vulnerabilidad-susceptibilidad</u> de una planta a una plaga;	P	Category : TRANSLATION (1626) Colombia (27 Sep 2023 10:11 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "vulnerabilidad" por "susceptibilidad".
177	se identifica un cambio en la vulnerabilidad de una planta a una plaga;	C	Category : TRANSLATION (959) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)

			Colombia (17 ago 2023 10:16) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "vulnerabilidad" por "susceptibilidad".
178	se produce un cambio en la virulencia (esto es, la agresividad) o <u>el existe una ampliación del rango de hospedantes de una plaga.</u>	P	Category : TECHNICAL (1627) Colombia (27 Sep 2023 10:14 PM) Se sugiere incluir la frase "o existe una ampliación del " para los casos en que se reporta resistencia de una plaga al control que se ha estado manejando.
183	se descubre una infestación o un brote de una plaga nueva dentro de un área (<u>que podrá ser en el país exportador o en otro país o conjunto de países;</u>)	P	Category : TECHNICAL (1738) Costa Rica (30 Sep 2023 4:31 AM) Esta parte no está en el texto original de la NIMF 2 y no agrega información.
183	se descubre una infestación o un brote de una plaga nueva dentro de un área (<u>que podrá ser en el país exportador o en otro país o conjunto de países)</u> área;	P	Category : TECHNICAL (960) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Esta parte no está en el texto original de la NIMF 2 y no agrega información.
198	se lleva a cabo <u>un examen una revisión</u> nacional de la reglamentación fitosanitaria o de los requisitos u operaciones pertinentes;	P	Category : TRANSLATION (1628) Colombia (27 Sep 2023 10:15 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "un examen" por "una revisión".
198	se lleva a cabo un examen nacional de la reglamentación fitosanitaria o de los requisitos u operaciones pertinentes;	C	Category : TRANSLATION (961) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:20) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "un examen" por "una revisión".
199	se examina una propuesta formulada por otro país o por una organización internacional (por ejemplo, <u>una organización nacional de protección fitosanitaria (ORPF)</u> , la FAO);	P	Category : TECHNICAL (1739) Costa Rica (30 Sep 2023 4:32 AM) En la NIMF 11 no se incluye
200	se realiza una nueva evaluación de una propuesta normativa de otro país u organización internacional;	C	Category : EDITORIAL (962) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Peru (21 ago 2023 1:28) Debería unirse el texto con el de la viñeta anterior

228	efectos adversos en organismos no objetivo benéficos para las plantas (como polinizadores o <u>predadores depredadores</u> de plagas).	P	<i>Category : TRANSLATION (1629) Colombia (27 Sep 2023 10:17 PM)</i> Se sugiere reemplazar el término predadores por depredadores.
228	efectos adversos en organismos no objetivo benéficos para las plantas (como polinizadores o <u>predadores</u> de plagas).	C	<i>Category : TRANSLATION (963) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Colombia (17 ago 2023 10:23) Se sugiere reemplazar el término "predadores" por "depredadores".
229	Entre los casos particulares para el análisis se incluyen las especies vegetales, los agentes de control biológico y otros organismos benéficos (véase la NIMF 3, <i>Directrices para la exportación, el envío, la importación y liberación de agentes de control biológico y otros organismos benéficos</i>), los organismos de los que aún no existe una denominación o descripción completa o que sean difíciles de identificar, los organismos importados deliberadamente y los OVM. <u>En el caso de plantas que son OVM, la posibilidad de que sean plagas debería determinarse conforme a lo descrito en el Anexo 5.</u> La posibilidad de que sean plantas consideradas como plagas debería determinarse conforme a lo descrito en el Anexo 6. <u>En el caso de plantas que son OVM, la posibilidad de que sean plagas debería determinarse conforme a lo descrito en el Anexo 5.</u>	P	<i>Category : EDITORIAL (1740) Costa Rica (30 Sep 2023 4:33 AM)</i> Se sugiere cambiar el orden para citar en los Anexos por número
230	3.1 Agentes de control biológico y otros organismos <u>beneficiosos</u>	P	<i>Category : TECHNICAL (1741) Costa Rica (30 Sep 2023 4:33 AM)</i> Término correcto
230	3.1 Agentes de control biológico y otros organismos <u>beneficiosos</u>	C	<i>Category : TRANSLATION (964) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Debería traducirse como "benéficos"
230	3.1 Agentes de control biológico y otros organismos <u>beneficiosos</u>	P	<i>Category : TECHNICAL (507) Dominican Republic (27 Jul 2023 8:42 PM)</i>
230	3.1 Agentes de control biológico y otros organismos <u>beneficiosos</u>	P	<i>Category : TECHNICAL (506) Nicaragua (27 Jul 2023 8:42 PM)</i> Término apropiado
230	3.1 Agentes de control biológico y otros organismos <u>beneficiosos</u>	P	<i>Category : TECHNICAL (505) OIRSA (27 Jul 2023 8:42 PM)</i> uso correcto de término
238	Cuando se solicite la importación de un organismo que pueda ser una plaga para su	P	<i>Category : TRANSLATION</i>

	uso en la investigación científica o bien en la educación, en la industria o para otros fines, debería definirse claramente la identidad del organismo. Se podrá evaluar información sobre el organismo o sobre organismos muy emparentados estrechamente relacionados con este para determinar los indicadores de que pueda ser una plaga. Se podrá efectuar una evaluación del riesgo de plagas para los organismos que se haya determinado que son plagas.		(1630) Colombia (27 Sep 2023 10:19 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "muy emparentados" por "estrechamente relacionados".
238	Cuando se solicite la importación de un organismo que pueda ser una plaga para su uso en la investigación científica o bien en la educación, en la industria o para otros fines, debería definirse claramente la identidad del organismo. Se podrá evaluar información sobre el organismo o sobre organismos muy emparentados con este para determinar los indicadores de que pueda ser una plaga. Se podrá efectuar una evaluación del riesgo de plagas para los organismos que se haya determinado que son plagas.	C	<i>Category : TRANSLATION</i> (965) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:24) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "muy emparentados" por "estrechamente relacionados".
242	5. Información	P	<i>Category : TECHNICAL</i> (1744) Costa Rica (30 Sep 2023 4:35 AM) Se sugiere eliminar toda la sección 5. "información" para evitar repeticiones con la sección 1 del anexo 1, y con la sección 2.1 del texto central de la norma.
242	5. Información	C	<i>Category : SUBSTANTIVE</i> (966) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se sugiere eliminar toda la sección 5. "información" para evitar repeticiones con la sección 1 del anexo 1, y con la sección 2.1 del texto central de la norma.
243	La recopilación de información es un elemento básico de todas las etapas del ARP. Debería llevarse a cabo en la etapa inicial para aclarar la identidad de la plaga o plagas, su distribución actual y su asociación con plantas hospedantes o productos básicos, entre otros. Se recopilará más información cuando se precise para adoptar las decisiones necesarias a medida que prosiga el ARP.	P	<i>Category : TECHNICAL</i> (1742) Costa Rica (30 Sep 2023 4:34 AM) Se sugiere eliminar toda la sección 5. "información" para evitar repeticiones con la sección 1 del anexo 1, y con la sección 2.1 del texto central de la norma.
244	La información para el ARP puede provenir de diversas fuentes. El suministro de la información oficial necesaria para el ARP, en la medida que sea posible, es una obligación de las partes contratantes prevista en la CIPF (artículo VIII.1.c)) y facilitada por los puntos de contacto oficiales (artículo VIII.2).	P	<i>Category : TECHNICAL</i> (1743) Costa Rica (30 Sep 2023 4:34 AM) Se sugiere eliminar toda la sección 5. "información" para evitar repeticiones con la sección 1 del anexo 1, y con la sección 2.1 del texto central de la norma.

247	También se podrá investigar la posibilidad de utilizar un ARP de un organismo, plaga o vía similares, especialmente cuando se carezca de información sobre el organismo específico o cuando la información esté incompleta. La información recopilada para otros fines, como evaluaciones del impacto ambiental del mismo organismo o de un organismo muy emparentado estrechamente relacionado con él, puede ser de utilidad pero no sustituir el ARP.	P	Category : TRANSLATION (1631) Colombia (27 Sep 2023 10:20 PM) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "muy emparentado" por "estrechamente relacionado".
247	También se podrá investigar la posibilidad de utilizar un ARP de un organismo, plaga o vía similares, especialmente cuando se carezca de información sobre el organismo específico o cuando la información esté incompleta. La información recopilada para otros fines, como evaluaciones del impacto ambiental del mismo organismo o de un organismo muy emparentado con él, puede ser de utilidad pero no sustituir el ARP.	C	Category : TRANSLATION (967) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:25) Para estar en armonía con el texto en inglés, se sugiere cambiar el término "muy emparentados" por "estrechamente relacionados".
283	Es necesario definir claramente la identidad de la plaga para garantizar que la evaluación se está realizando en un organismo distinto y que la información biológica y de otro tipo utilizada en la evaluación es pertinente para el organismo en cuestión. Si esto no es posible porque debido a que el agente que causa determinados causal de síntomas particulares no está todavía plenamente identificado, deberá demostrarse entonces que el organismo produce síntomas sistemáticos y que es transmisible o capaz de dispersarse.	P	Category : TRANSLATION (1632) Colombia (27 Sep 2023 10:22 PM) Para estar en armonía con el texto en inglés y en el contexto fitopatológico, se sugiere cambiar la expresión "porque el agente que causa determinados síntomas" por "debido a que el agente causal de síntomas particulares".
284	La unidad taxonómica para la plaga es por lo general la especie. El uso de un nivel taxonómico superior o inferior deberá justificarse con razones científicas sólidas. En el caso de que se utilicen niveles inferiores a la especie, dicha justificación deberá incluir pruebas que demuestren que factores tales como las diferencias de virulencia, la resistencia a los plaguicidas, la adaptabilidad al medio ambiente, el rango del hospedante-de hospedantes o la relación del vector son lo suficientemente significativos para afectar al riesgo de plagas.	P	Category : EDITORIAL (1634) Colombia (27 Sep 2023 10:26 PM) Para estar en armonía con el texto en inglés se sugiere cambiar "del hospedante" por "de hospedantes"
284	La unidad taxonómica para la plaga es por lo general la especie. El uso de un nivel taxonómico superior o inferior deberá justificarse con razones científicas sólidas. En el caso de que se utilicen niveles inferiores a la especie, dicha justificación deberá incluir pruebas que demuestren que factores tales como las diferencias de virulencia, la resistencia a los plaguicidas, la adaptabilidad al medio ambiente, el rango del hospedante o la relación del vector son lo suficientemente significativos para afectar al riesgo de plagas.	C	Category : TRANSLATION (968) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:28) Para estar en armonía con el texto en inglés se sugiere cambiar "del hospedante" por "de hospedantes"
291	Si la plaga está presente pero no está ampliamente distribuida en el área del ARP,	P	Category : TRANSLATION (1745) Costa Rica (30 Sep 2023 4:36

	<p><u>podrá-debería</u> estar reglamentada. No obstante, deberá estar bajo control oficial o se espera que esté bajo control oficial en un futuro próximo.</p>		AM) La redacción en la NIMF 11 vigente es más apropiada. La palabra correcta es "debería".
291	<p>Si la plaga está presente pero no está ampliamente distribuida en el área del ARP, <u>podrá</u> estar reglamentada. No obstante, <u>deberá</u> estar bajo control oficial o se espera que esté bajo control oficial en un futuro próximo.</p>	C	Category : TRANSLATION (969) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) La redacción en la NIMF 11 vigente es más apropiada, La sección refiere a la condición reglamentaria en el área de ARP para plagas cuarentenarias presentes en el área
293	<p>Deberán facilitarse pruebas que justifiquen la conclusión de que la plaga podría establecerse o dispersarse en el área del ARP. Esta área (tomando en consideración también los entornos protegidos como los invernaderos) deberá tener las condiciones ecológicas y climáticas adecuadas para el establecimiento y la dispersión de la plaga. Donde sea apropiado, las especies hospedantes (o afines), los hospedantes <u>alternativos</u> y los vectores deberán estar presentes en el área del ARP.</p>	P	Category : TRANSLATION (1633) Colombia (27 Sep 2023 10:25 PM) Para estar en armonía con el texto en inglés se sugiere cambiar "del hospedante" por "de hospedantes"
293	<p>Deberán facilitarse pruebas que justifiquen la conclusión de que la plaga podría establecerse o dispersarse en el área del ARP. Esta área (tomando en consideración también los entornos protegidos como los invernaderos) deberá tener las condiciones ecológicas y climáticas adecuadas para el establecimiento y la dispersión de la plaga. Donde sea apropiado, las especies hospedantes (o afines), los hospedantes <u>alternativos</u> y los vectores deberán estar presentes en el área del ARP.</p>	C	Category : TRANSLATION (970) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:29) Para estar en armonía con el texto en inglés se sugiere cambiar "alternativos" por "alternos"
294	<p>2.1.5 Potencial de consecuencias <u>económicas</u> en el área del ARP</p>	P	Category : TECHNICAL (1746) Costa Rica (30 Sep 2023 4:37 AM) De acuerdo con el comentario general
302	<p>La evaluación de la probabilidad de dispersión se debería basar principalmente en consideraciones biológicas <u>y ecológicas</u> análogas a las que se aplican a la entrada y el establecimiento.</p>	P	Category : TECHNICAL (1635) Colombia (27 Sep 2023 10:27 PM) Se deben incluir consideraciones ecológicas porque éstas también inciden en la probabilidad de establecimiento.
308	<p>Es preciso tener en cuenta todas las vías pertinentes. Estas vías pueden identificarse principalmente en relación con la distribución geográfica y el rango de <u>hospedante</u> <u>hospedantes</u> de la plaga. Los envíos de plantas y productos vegetales que son objeto de comercio internacional son las vías de interés primordial y las modalidades de ese comercio determinarán, en una medida considerable, qué vías</p>	P	Category : TRANSLATION (1636) Colombia (27 Sep 2023 10:28 PM) Se sugiere cambiar a plural la palabra "hospedante" por "hospedantes"

	son pertinentes. Cuando sea apropiado, deberán tenerse en cuenta otras vías, como por ejemplo otros tipos de productos básicos, materiales de empaque, personas, equipaje, correo, transporte e intercambio de material científico. También deberá evaluarse la entrada por medios naturales, debido a que la dispersión natural posiblemente reduzca la eficacia de las medidas fitosanitarias.		
308	Es preciso tener en cuenta todas las vías pertinentes. Estas vías pueden identificarse principalmente en relación con la distribución geográfica y el rango de hospedante de la plaga. Los envíos de plantas y productos vegetales que son objeto de comercio internacional son las vías de interés primordial y las modalidades de ese comercio determinarán, en una medida considerable, qué vías son pertinentes. Cuando sea apropiado, deberán tenerse en cuenta otras vías, como por ejemplo otros tipos de productos básicos, materiales de empaque, personas, equipaje, correo, transporte e intercambio de material científico. También deberá evaluarse la entrada por medios naturales, debido a que la dispersión natural posiblemente reduzca la eficacia de las medidas fitosanitarias.	C	<p><i>Category : TRANSLATION (971) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i></p> <p>Para estar en armonía con el texto en inglés se sugiere cambiar "de hospedante" por "de hospedantes"</p>
325	Con el fin de calcular la probabilidad de establecimiento de una plaga, deberá obtenerse información biológica confiable (ciclo vital, rango del hospedante, epidemiología, supervivencia, etc.) de las áreas en las que actualmente está presente la plaga. A continuación, se puede comparar la situación en el área del ARP con la de las áreas en las que actualmente está presente la plaga (tomando en cuenta también los ambientes protegidos como, por ejemplo, los invernaderos) y recurrir a la opinión de expertos para evaluar la probabilidad de establecimiento. Es conveniente tener en cuenta casos concretos relacionados con plagas comparables. Entre los ejemplos de los factores que han de tenerse en cuenta se incluyen los siguientes:	P	<p><i>Category : EDITORIAL (1637) Colombia (27 Sep 2023 10:29 PM)</i></p> <p>Colocar una coma después de "A continuación",</p>
328	<u>la adaptabilidad</u> <u>probabilidad de adaptación</u> al medio ambiente en el área del ARP; <u>la disponibilidad de condiciones ambientales favorables en el área del ARP;</u>	P	<p><i>Category : TECHNICAL (1747) Costa Rica (30 Sep 2023 4:40 AM)</i></p> <p>Sugerimos se agregue "probabilidad de adaptación", considerando que la plaga no está en el área. Por otro lado, se considera que se debe tener en cuenta la disponibilidad de condiciones ambientales favorables en el área de ARP</p>
328	<u>la adaptabilidad al medio ambiente</u> <u>disponibilidad de condiciones ambientales favorables</u> en el área del ARP;	P	<p><i>Category : TECHNICAL (1638) Colombia (27 Sep 2023 10:31 PM)</i></p>

			Más que la adaptabilidad de una plaga a un nuevo medio ambiente (puede que esa información tan específica no exista o no esté disponible), se considera que se debe tener en cuenta es la disponibilidad de condiciones ambientales favorables en el área de ARP.
328	la <u>adaptabilidad</u> -probabilidad de adaptación al medio ambiente en el área del ARP; - la disponibilidad de condiciones ambientales favorables en el área del ARP;	P	<p>Category : TECHNICAL (972) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Sugerimos se agregue "probabilidad de adaptación", considerando que la plaga no está en el área.</p> <p>Para este nuevo ítem propuesto es necesario desarrollar una explicación, la cual podría incluirse en el Item de "Probabilidad de adaptación al medio ambiente en el área del ARP".</p>
332	3.2.1 Disponibilidad de hospedantes apropiados, hospedantes alternativos-alternos y vectores en el área del ARP	P	<p>Category : TRANSLATION (1639) Colombia (27 Sep 2023 10:31 PM) Para estar en armonía con el texto en inglés se sugiere cambiar "alternativos" por "alternos"</p>
332	3.2.1 Disponibilidad de hospedantes apropiados, hospedantes alternativos y vectores en el área del ARP	C	<p>Category : TRANSLATION (973) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:46) Para estar en armonía con el texto en inglés se sugiere cambiar "alternativos" por "alternos"</p>
334	si están presentes especies hospedantes y especies hospedantes <u>alternativas-alternas</u> y, en caso afirmativo, si son abundantes y están ampliamente distribuidas;	P	<p>Category : TRANSLATION (1640) Colombia (27 Sep 2023 10:32 PM) Para estar en armonía con el texto en inglés se sugiere cambiar "alternativas" por "alternas"</p>
334	si están presentes especies hospedantes y especies hospedantes <u>alternativas</u> y, en caso afirmativo, si son abundantes y están ampliamente distribuidas;	C	<p>Category : TRANSLATION (974) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:46) Para estar en armonía con el texto en inglés se sugiere cambiar "alternativas" por "alternas"</p>

335	si están presentes especies hospedantes o especies hospedantes <u>alternativas alternas</u> , lo suficientemente próximas desde el punto de vista geográfico para que la plaga pueda completar su ciclo vital;	P	Category : TRANSLATION (1641) Colombia (27 Sep 2023 10:52 PM) Para estar en armonía con el texto en inglés se sugiere cambiar "alternativas" por "alternas"
346	el uso destinado del producto básico (por ejemplo, para plantar, <u>elaboración procesamiento</u> y consumo);	P	Category : TRANSLATION (1642) Colombia (27 Sep 2023 10:53 PM) El término "elaboración" no está en la NIMF 5 y no se entiende a qué se refiere, Se sugiere cambiarlo por "procesamiento"
346	el uso destinado del producto básico (por ejemplo, para plantar, elaboración y consumo);	C	Category : TRANSLATION (975) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) "Commodity" debe traducirse como "Producto". Se sugiere cambiar "elaboración" por "procesamiento"
348	Algunos usos (por ejemplo, la plantación) están asociados con una probabilidad de introducción mucho más alta que otros (por ejemplo, <u>la elaboración</u>) <u>el consumo</u>). También deberán tenerse en cuenta las probabilidades asociadas con el crecimiento, la elaboración o la eliminación del producto básico en las cercanías de especies hospedantes apropiadas.	P	Category : TRANSLATION (566) CA (12 Aug 2023 2:31 AM) Existe un error de traducción puesto que el uso previsto "elaboración" no existe.
363	la presencia de <u>obstáculos</u> - <u>barreras</u> naturales;	P	Category : TRANSLATION (1643) Colombia (27 Sep 2023 10:54 PM) Para estar en armonía con el texto en inglés se sugiere cambiar "obstáculos" por "barreras"
363	la presencia de <u>obstáculos</u> naturales;	C	Category : TRANSLATION (976) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:50) Para estar en armonía con el texto en inglés se sugiere cambiar "obstáculos" por "barreras"
369	La información sobre la probabilidad de dispersión se utiliza para determinar la rapidez con que puede expresarse la importancia económica potencial de una plaga en el área del ARP. Esto también es importante si la plaga tiene probabilidad de entrar y establecerse en un área <u>con escasa</u> - <u>donde puede ser de baja</u> importancia económica potencial y luego dispersarse a otra en la que esta es elevada. Además,	P	Category : SUBSTANTIVE (1644) Colombia (27 Sep 2023 10:56 PM) Para dar un sentido apropiado al texto se sugiere cambiar "en un área con escasa importancia económica potencial" por "en un

	puede ser importante en la etapa del manejo del riesgo, cuando se examina la posibilidad de mantener o erradicar una plaga introducida.		área donde puede ser de baja importancia económica potencial" ya que el área en si no es de baja importancia, sino que la plaga tiene baja importancia en el área.
374	4. Evaluación de las consecuencias <u>económicas</u> potenciales	P	<i>Category : TECHNICAL (1748) Costa Rica (30 Sep 2023 4:41 AM)</i> De acuerdo con el comentario general
374	4. Evaluación de las consecuencias <u>económicas</u> potenciales	P	<i>Category : TECHNICAL (977) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (21 ago 2023 11:29) De acuerdo con el comentario general
375	<u>El propósito de esta evaluación es identificar las posibles consecuencias económicas que podrían esperarse como resultado de la introducción y dispersión de una plaga.</u> En el ARP, las consecuencias no deberían entenderse exclusivamente como efectos comerciales o económicos. Los bienes y servicios que no se venden en los mercados comerciales pueden tener un valor económico y, en este sentido, el análisis económico comprende mucho más que el estudio de los bienes y servicios del mercado. El uso de la expresión "efectos económicos" proporciona un marco en el, sino que podrá analizarse una gran variedad de efectos de consecuencias de efectos (incluidos los diversa índole económicas, ambientales y sociales) o sociales. El análisis económico utiliza un valor monetario como medida para que los encargados Suplemento 2 de formular políticas puedan comparar los costos y los beneficios la NIMF 5 proporciona directrices sobre la interpretación de diferentes tipos de bienes la importancia económica potencial y servicios. Ello no impide que se puedan emplear otros instrumentos, como análisis cualitativos y ambientales, que no utilicen términos monetarios. Las repercusiones económicas se describen en el Suplemento 2 de relacionados, incluida la NIMF 5 referencia a condiciones ambientales.	P	<i>Category : TECHNICAL (978) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (22 ago 2023 12:17) 1)Para simplificar y decir explícitamente que cuando se evalúa el impacto de la introducción de una plaga también deben considerarse los impactos ambientales, sociales y culturales.2) Se elimina texto por ser repetición del Suplemento 2 de la NIMF 5. 3) Ultima frase modificada para ser coherente con el propósito del suplemento 2 de la NIMF 5
375	En el ARP, las consecuencias no deberían entenderse exclusivamente como efectos comerciales o económicos. Los bienes y servicios que no se venden en los mercados comerciales pueden tener un valor económico y, en este sentido, el análisis económico comprende mucho más que el estudio de los bienes y servicios del mercado. El uso de la expresión "efectos económicos" proporciona un marco en el que podrá analizarse una gran variedad de efectos (incluidos los ambientales y sociales). El análisis económico utiliza un valor monetario como medida para que los encargados de formular políticas puedan comparar los costos y los beneficios	C	<i>Category : TECHNICAL (510) OIRSA (27 Jul 2023 8:50 PM)</i> al considerar "efectos ambientales y sociales" podrá utilizarse como barreras comerciales

	de diferentes tipos de bienes y servicios. Ello no impide que se puedan emplear otros instrumentos, como análisis cualitativos y ambientales, que no utilicen términos monetarios. Las repercusiones económicas se describen en el Suplemento 2 de la NIMF 5.		
378	<p>En muchos casos, no es necesario un análisis detallado de las consecuencias económicas estimadas si existen pruebas suficientes o hay un amplio acuerdo de que la introducción de una plaga tendrá consecuencias económicas inaceptables (incluyendo consecuencias ambientales). En tales casos, la evaluación del riesgo de plagas se podrá centrar principalmente en la probabilidad de introducción y dispersión. Sin embargo, se deberían examinar más detenidamente los factores económicos cuando <u>esté en entredicho</u>-no haya claridad sobre el nivel de las consecuencias económicas o cuando sea necesario conocer ese nivel para evaluar la intensidad de las medidas utilizadas en el manejo del riesgo de plagas o para determinar la relación costo-beneficio de la exclusión o el control.</p>	P	<p>Category : TRANSLATION (1645) Colombia (27 Sep 2023 10:57 PM) Para estar en armonía con el texto en inglés se sugiere cambiar "esté en entredicho" por "no haya claridad sobre"</p>
378	<p>En muchos casos, no es necesario un análisis detallado de las consecuencias económicas estimadas si existen pruebas suficientes o hay un amplio acuerdo de que la introducción de una plaga tendrá consecuencias económicas inaceptables (incluyendo consecuencias ambientales). En tales casos, la evaluación del riesgo de plagas se podrá centrar principalmente en la probabilidad de introducción y dispersión. Sin embargo, se deberían examinar más detenidamente los factores económicos cuando esté en <u>entredicho</u> el nivel de las consecuencias económicas o cuando sea necesario conocer ese nivel para evaluar la intensidad de las medidas utilizadas en el manejo del riesgo de plagas o para determinar la relación costo-beneficio de la exclusión o el control.</p>	C	<p>Category : TRANSLATION (979) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:55) Para estar en armonía con el texto en inglés se sugiere cambiar "esté en entredicho" por "no haya claridad sobre"</p>
386	<p>Los efectos y las consecuencias ambientales <u>que se consideren considerados</u>, deberían ser los que <u>resultaran resulten</u> de los efectos de las plagas en las plantas. Sin embargo, tales efectos en las plantas podrán ser menos significativos que los efectos o consecuencias en otros organismos o sistemas. Por ejemplo, una planta considerada como una plaga que solo tenga un efecto menor en otras plantas podrá resultar muy alergénica para los humanos o un patógeno vegetal menor podrá producir toxinas que afecten seriamente al ganado. No obstante, la reglamentación de las plantas basada exclusivamente en sus efectos en otros organismos o sistemas (por ejemplo, en la salud humana o animal) está fuera del ámbito de esta norma. Si el proceso del ARP revela pruebas de un peligro potencial para otros organismos o</p>	P	<p>Category : TRANSLATION (1646) Colombia (27 Sep 2023 10:59 PM) Para estar en armonía con el texto en inglés se sugiere modificar la frase "que se consideren deberían ser los que resultaran" por "considerados, deben ser los que resulten"</p>

	sistemas, ello debería comunicarse a las autoridades competentes que tengan la responsabilidad legal para tratar dicho asunto.		
386	Los efectos y las consecuencias ambientales que se consideren deberían ser los que resultaran de los efectos de las plagas en las plantas. Sin embargo, tales efectos en las plantas podrán ser menos significativos que los efectos o consecuencias en otros organismos o sistemas. Por ejemplo, una planta considerada como una plaga que solo tenga un efecto menor en otras plantas podrá resultar muy alergénica para los humanos o un patógeno vegetal menor podrá producir toxinas que afecten seriamente al ganado. No obstante, la reglamentación de las plantas basada exclusivamente en sus efectos en otros organismos o sistemas (por ejemplo, en la salud humana o animal) está fuera del ámbito de esta norma. Si el proceso del ARP revela pruebas de un peligro potencial para otros organismos o sistemas, ello debería comunicarse a las autoridades competentes que tengan la responsabilidad legal para tratar dicho asunto.	C	<p>Category : TRANSLATION (980) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:56) Para estar en armonía con el texto en inglés se sugiere modificar la frase "que se consideren deberían ser los que resultaran" por "considerados, deberían ser los que resulten"</p>
410	Al considerar los efectos sobre los mercados internos y de exportación, deberán calcularse las consecuencias potenciales que podría tener el establecimiento de la plaga para el acceso a los mercados. Para ello es necesario examinar la amplitud de cualesquiera reglamentaciones fitosanitarias cualquier reglamentación fitosanitaria que se hayan haya impuesto (o que probablemente impondrán) los países importadores.	P	<p>Category : TRANSLATION (1647) Colombia (27 Sep 2023 11:00 PM) Para estar en armonía con el texto en inglés se sugiere modificar la frase "cualesquiera reglamentaciones fitosanitarias que se hayan impuesto" por "cualquier reglamentación fitosanitaria que se haya impuesto"</p>
410	Al considerar los efectos sobre los mercados internos y de exportación, deberán calcularse las consecuencias potenciales que podría tener el establecimiento de la plaga para el acceso a los mercados. Para ello es necesario examinar la amplitud de cualesquiera reglamentaciones fitosanitarias que se hayan impuesto (o que probablemente impondrán) los países importadores.	C	<p>Category : TRANSLATION (981) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 10:58) Para estar en armonía con el texto en inglés se sugiere modificar la frase "cualesquiera reglamentaciones fitosanitarias que se hayan impuesto" por "cualquier reglamentación fitosanitaria que se haya impuesto"</p>
425	<u>Presupuestación-Estimación parcial:</u> esta técnica se podrá utilizar si los efectos económicos inducidos por la acción de la plaga se limitan por lo general a los productores y se consideran relativamente secundarios.	P	<p>Category : TRANSLATION (1648) Colombia (27 Sep 2023 11:02 PM) Para estar en armonía con el texto en inglés se sugiere modificar la palabra "Presupuestación" por "Estimación"</p>
430	La aplicación de esta norma a las consecuencias ambientales requiere una	P	<p>Category : TECHNICAL (567) CA (12 Aug 2023 2:34 AM)</p>

	categorización clara de los valores del medio ambiente y de las metodologías utilizadas para su evaluación. El medio ambiente podrá valorarse utilizando varias metodologías, pero la mejor manera de aplicar estas es en consulta con expertos en <u>economía</u> <u>evaluación del impacto ambiental</u> . Las metodologías pueden incluir el examen de los valores de “uso” y “no uso”. Los valores de “uso” surgen a raíz del consumo de elementos del medio ambiente, tales como el acceso al agua no contaminada o la pesca en un lago, y comprenden también aquellos que no se consumen, como el uso de los bosques para actividades recreativas. Los valores de “no uso” se pueden subdividir en:		La evaluación del impacto ambiental se sugiere que debe realizarla un experto en el tema como un Ingeniero Ambiental o de una carrera afín y no un economista como se menciona en el párrafo
436	4.3 Conclusión de la evaluación de las consecuencias	C	Category : TECHNICAL (982) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Ver comentario general
439	Deberá indicarse la parte del área del ARP donde la presencia de la plaga daría lugar a <u>importantes</u> pérdidas económicas.	P	Category : TECHNICAL (515) Dominican Republic (27 Jul 2023 8:53 PM)
439	Deberá indicarse la parte del área del ARP donde la presencia de la plaga daría lugar a <u>importantes-a</u> pérdidas económicas.	P	Category : TECHNICAL (514) Nicaragua (27 Jul 2023 8:52 PM) Mejor comprensión del texto
439	Deberá indicarse la parte del área del ARP donde la presencia de la plaga daría lugar a <u>importantes</u> pérdidas económicas.	P	Category : TECHNICAL (513) Dominican Republic (27 Jul 2023 8:52 PM)
439	Deberá indicarse la parte del área del ARP donde la presencia de la plaga daría lugar a <u>importantes</u> pérdidas económicas.	P	Category : TECHNICAL (512) OIRSA (27 Jul 2023 8:52 PM) mejor redacción del párrafo
441	La determinación de la probabilidad de introducción de plagas y de sus <u>consecuencias</u> entraña muchas incertidumbres. En particular, esa determinación constituye una extrapolación de la situación en la que se produce la plaga a la situación hipotética en el área del ARP. En la evaluación se deberían documentar el ámbito de la incertidumbre y su grado, e indicar si se ha recurrido a la opinión de expertos. Esto es importante para fomentar la transparencia y puede ser útil para determinar las necesidades de investigación y establecer un orden de prioridades al respecto.	C	Category : TECHNICAL (983) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Ver comentario general
443	Como resultado de la evaluación del riesgo de plagas, todas o algunas de las plagas clasificadas podrán considerarse apropiadas para el manejo del riesgo de plagas. Para cada plaga, podrá identificarse la totalidad o parte del área del ARP que	P	Category : TRANSLATION (1649) Colombia (27 Sep 2023 11:06 PM) Para estar en armonía con el texto en inglés se sugiere cambiar de lugar la frase "se

	<p>constituye un área en peligro. Se ha obtenido y documentado o se hubiera podido asegurar una valoración general de una estimación cuantitativa o cualitativa de la probabilidad de introducción y dispersión de una o varias plagas y la correspondiente estimación cuantitativa o cualitativa de las consecuencias, o se podría haber asignado una calificación general. Estas estimaciones, con la incertidumbre que las acompaña, se utilizan en la etapa del manejo del riesgo de plagas del ARP.</p>		<p>hubiera podido asegurar una valoración general de" y ubicarla y modificarla por "o se podría haber asignado una calificación general"</p>
443	<p>Como resultado de la evaluación del riesgo de plagas, todas o algunas de las plagas clasificadas podrán considerarse apropiadas para el manejo del riesgo de plagas. Para cada plaga, podrá identificarse la totalidad o parte del área del ARP que constituye un área en peligro. Se ha obtenido y documentado o se hubiera podido asegurar una valoración general de una estimación cuantitativa o cualitativa de la probabilidad de introducción y dispersión de una o varias plagas y la correspondiente estimación cuantitativa o cualitativa de las consecuencias. Estas estimaciones, con la incertidumbre que las acompaña, se utilizan en la etapa del manejo del riesgo de plagas del ARP.</p>	C	<p>Category : TECHNICAL (984) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Ver comentario general</p>
452	<p>En la Etapa 3 se aborda la identificación y la evaluación de las opciones de manejo del riesgo de plagas y su selección posterior para que se apliquen como medidas fitosanitarias que, por sí solas o en combinación, reduzcan el riesgo de introducción y dispersión de una plaga en plagas a un grado-nivel aceptable.</p>	P	<p>Category : TECHNICAL (985) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (22 ago 2023 12:31) Para evitar repetición y por coherencia a través del texto</p>
453	<p>Las conclusiones de la evaluación del riesgo de plagas se utilizan para decidir si un riesgo de plagas es aceptable o no. Como no es razonable esperar que no haya ningún tipo de riesgo, el riesgo de plagas se debería gestionar siguiendo el principio básico del riesgo manejado (véase la Norma internacional para medidas fitosanitarias [NIMF] 1) con vistas a lograr el nivel adecuado de protección que se pueda justificar y que sea viable dentro de los límites de las opciones y los recursos disponibles⁵. La incertidumbre observada en las evaluaciones del riesgo de plagas se debería tener en cuenta en la selección de una opción de manejo del riesgo de plagas.</p>	C	<p>Category : TECHNICAL (1749) Costa Rica (30 Sep 2023 4:42 AM) La actual redacción en la NIMF 11 es más clara, el texto agregado proviene de la NIMF 11</p>
453	<p>Las conclusiones de la evaluación del riesgo de plagas se utilizan para decidir si un riesgo de plagas es aceptable o no. Como no, si es razonable esperar necesario el manejo del riesgo y la intensidad de medidas han de aplicarse. Dado que el riesgo cero no haya ningún tipo de riesgo es una opción razonable, el riesgo de plagas se debería gestionar siguiendo el principio básico del riesgo manejado (véase la</p>	P	<p>Category : TECHNICAL (986) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (22 ago 2023 12:47) La actual redacción en la NIMF 11 es más clara, el texto agregado proviene de la NIMF 11</p>

	Norma internacional para medidas fitosanitarias [NIMF] 1) con vistas a lograr el nivel adecuado de protección que se pueda justificar y que sea viable dentro de los límites de las opciones y los recursos disponibles ⁵ . <u>El manejo del riesgo de plagas (en sentido analítico) es el proceso mediante el cual se identifican formas de reaccionar ante un riesgo percibido, se evalúa la eficacia de esas medidas y se identifican las opciones más apropiadas.</u> La incertidumbre observada en las evaluaciones del riesgo de plagas se debería tener en cuenta en la selección de una opción de manejo del riesgo de plagas.		
455	Las medidas fitosanitarias no están justificadas si el riesgo de plagas se considera aceptable o si dichas medidas no son viables, como ocurre en el caso de la dispersión natural. No obstante, incluso en esos casos, las partes contratantes podrán optar por mantener un cierto grado de seguimiento o <u>auditoría-evaluación</u> en relación con el riesgo de plagas a fin de detectar cambios en dicho riesgo.	P	<p>Category : TECHNICAL (1750) Costa Rica (30 Sep 2023 4:43 AM) El termino "Auditoria" tiene un contexto diferente</p>
455	Las medidas fitosanitarias no están justificadas si el riesgo de plagas se considera aceptable o si dichas medidas no son viables, como ocurre en el caso de la dispersión natural. No obstante, incluso en esos casos, las partes contratantes podrán optar por mantener un cierto grado de seguimiento o <u>auditoría-evaluación</u> en relación con el riesgo de plagas a fin de detectar cambios en dicho riesgo.	P	<p>Category : TECHNICAL (987) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) OIRSA (15 ago 2023 8:19) El termino "Auditoria" tiene un contexto diferente</p>
455	Las medidas fitosanitarias no están justificadas si el riesgo de plagas se considera aceptable o si dichas medidas no son viables, como ocurre en el caso de la dispersión natural. No obstante, incluso en esos casos, las partes contratantes podrán optar por mantener un cierto grado de seguimiento o <u>auditoría-evaluación</u> en relación con el riesgo de plagas a fin de detectar cambios en dicho riesgo.	P	<p>Category : TECHNICAL (519) Nicaragua (27 Jul 2023 9:02 PM) Término apropiado</p>
455	Las medidas fitosanitarias no están justificadas si el riesgo de plagas se considera aceptable o si dichas medidas no son viables, como ocurre en el caso de la dispersión natural. No obstante, incluso en esos casos, las partes contratantes podrán optar por mantener un cierto grado de seguimiento o <u>auditoría</u> en relación con el riesgo de plagas a fin de detectar cambios en dicho riesgo.	P	<p>Category : TECHNICAL (518) Dominican Republic (27 Jul 2023 8:59 PM) la palabra auditoria esta en otro norma</p>
455	Las medidas fitosanitarias no están justificadas si el riesgo de plagas se considera aceptable o si dichas medidas no son viables, como ocurre en el caso de la dispersión natural. No obstante, incluso en esos casos, las partes contratantes podrán optar por mantener un cierto grado de seguimiento o <u>auditoría-evaluación</u> en relación con el riesgo de plagas a fin de detectar cambios en dicho riesgo.	P	<p>Category : TECHNICAL (516) OIRSA (27 Jul 2023 8:57 PM) El termino "Auditoria" tiene un contexto diferente</p>
457	Al aplicar el principio del riesgo manejado, <u>se reconoce que</u> las partes contratantes	P	<p>Category : EDITORIAL (988) IPPC Regional Workshop Latin</p>

	tienen el derecho soberano de decidir el nivel del riesgo de plagas que consideran aceptable y pueden utilizar las medidas fitosanitarias para proporcionar un nivel adecuado de protección. De igual forma, las partes contratantes deberían seguir el principio de las repercusiones mínimas al aplicar medidas fitosanitarias (véase el artículo VII.2 g) de la Convención Internacional de Protección Fitosanitaria [CIPF]).		America (18 Sep 2023 8:25 PM) Uruguay (22 ago 2023 12:51) No es necesario
465	Las evaluaciones del riesgo de plagas permiten determinar las plagas cuarentenarias que podrán requerir la adopción de medidas fitosanitarias en relación con la vía evaluada. En lo relativo a la formulación de las opciones de manejo del riesgo de plagas, <u>la evaluación del riesgo de plagas proporciona información de interés, como se debería considerar:</u>	P	<i>Category : TECHNICAL</i> (1751) Costa Rica (30 Sep 2023 4:45 AM) No es información brindada por la evaluación de riesgo, sino que son insumos para la toma de decisión sobre las medidas de riesgo disponibles.
465	Las evaluaciones del riesgo de plagas permiten determinar las plagas cuarentenarias que podrán requerir la adopción de medidas fitosanitarias <u>en relación con la vía evaluada.</u> En lo relativo a la formulación de las opciones de manejo del riesgo de plagas, la evaluación del riesgo de plagas proporciona información de interés, como:	P	<i>Category : EDITORIAL</i> (1650) Colombia (27 Sep 2023 11:07 PM) Cambio en concordancia con la recomendación de la RAE
465	Las evaluaciones del riesgo de plagas permiten determinar las plagas cuarentenarias que podrán requerir la adopción de medidas fitosanitarias <u>en relación con la vía evaluada.</u> En lo relativo a la formulación de las opciones de manejo del riesgo de plagas, <u>la evaluación del riesgo de plagas proporciona-se debería considerar</u> información de interés, <u>tal</u> como:	P	<i>Category : TECHNICAL</i> (989) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 11:04) Cambio en concordancia con la recomendación de la RAE No es información brindada por la evaluación de riesgo, sino que son insumos para la toma de decisión sobre las medidas de riesgo disponibles.
475	Los siguientes cuatro principios fitosanitarios que se describen en la NIMF 1 deberían tenerse en cuenta al identificar las opciones apropiadas de manejo del riesgo de plagas, a saber: <u>- Riesgo Manejado: aplicar medidas fitosanitarias basándose en una política de riesgo manejado, que reconozca que siempre existe riesgo de dispersión e introducción de plagas cuando se importan plantas, productos vegetales y otros artículos reglamentados.</u>	P	<i>Category : TECHNICAL</i> (1752) Costa Rica (30 Sep 2023 4:47 AM) Se agrega el principio de "Riesgo manejado", siendo uno de los más importantes para opciones apropiadas de manejo.
475	Los <u>siguientes cuatro</u> principios fitosanitarios que se describen en la NIMF 1 deberían tenerse en cuenta al identificar las opciones apropiadas de manejo del riesgo de plagas, <u>a saber en particular los siguientes:</u>	P	<i>Category : EDITORIAL</i> (990) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)

476	<p><u>Riesgo manejado: aplicar medidas fitosanitarias basándose en una política de riesgo manejado, que reconozca que siempre existe riesgo de dispersión e introducción de plagas cuando se importan plantas, productos vegetales y otros artículos reglamentados.</u></p> <p>- <u>Necesidad:</u> solo se deberían adoptar las medidas fitosanitarias necesarias para proteger la sanidad vegetal.</p>	P	<p>Category : TECHNICAL (991) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se agrega el principio de "Riesgo manejado", siendo uno de los más importantes para opciones apropiadas de manejo.</p>
481	<p>Las opciones de manejo del riesgo de plagas deberían basarse en el riesgo de plagas de una vía en particular y del uso previsto (puede encontrarse más información al respecto en la NIMF 32 (<i>Categorización de productos según su riesgo de plagas</i>)).</p> <p>El nivel de riesgo podrá diferir según la vía: <u>por ejemplo, la presencia de una plaga en el material de colección podrá representar un riesgo muy distinto al de la misma plaga en una fruta destinada al consumo</u>. Por lo tanto, las opciones de manejo del riesgo de plagas para las mismas plagas podrán variar en función de la vía. Además, el tipo de medida determinada como opción de manejo del riesgo de plagas podrá variar según la tolerancia del producto a la medida.</p>	P	<p>Category : EDITORIAL (992) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se sugiere eliminar el ejemplo porque no aporta claridad.</p>
481	<p>Las opciones de manejo del riesgo de plagas deberían basarse en el riesgo de plagas de una vía en particular y del uso previsto (puede encontrarse más información al respecto en la NIMF 32 (<i>Categorización de productos según su riesgo de plagas</i>)). El nivel de riesgo podrá diferir según la vía: por ejemplo, la presencia de una plaga en <u>el-un material de colección para consumo humano (uso previsto)</u> podrá representar un riesgo <u>muy</u> distinto <u>al de a productos destinados para la misma plaga en una fruta destinada al consumo siembra</u>. Por lo tanto, las opciones de manejo del riesgo de plagas para las mismas plagas podrán variar en función de la vía. Además, el tipo de medida determinada como opción de manejo del riesgo de plagas podrá variar según la tolerancia del producto a la medida.</p>	P	<p>Category : TECHNICAL (524) Nicaragua (27 Jul 2023 10:22 PM) Mejor comprensión del texto</p>
481	<p>Las opciones de manejo del riesgo de plagas deberían basarse en el riesgo de plagas de una vía en particular y del uso previsto (puede encontrarse más información al respecto en la NIMF 32 (<i>Categorización de productos según su riesgo de plagas</i>)). El nivel de riesgo podrá diferir según la vía: por ejemplo, la presencia de una plaga en <u>el-un material de colección para consumo humano (uso previsto)</u> podrá representar un riesgo <u>muy</u> distinto <u>al de a productos destinados para la misma plaga en una fruta destinada al consumo siembra</u>. Por lo tanto, las opciones de manejo del riesgo de plagas para las mismas plagas podrán variar en función de la vía. Además, el tipo de medida determinada como opción de manejo</p>	P	<p>Category : TECHNICAL (523) OIRSA (27 Jul 2023 10:21 PM) mejor ejemplificación del nivel de riesgo</p>

	del riesgo de plagas podrá variar según la tolerancia del producto a la medida.		
483	El riesgo principal de introducción de plagas se da con los envíos importados de plantas y productos vegetales, sin embargo (especialmente para un ARP realizado para una plaga particular) también es necesario considerar el riesgo de introducción con otros tipos de vías, (por ejemplo, materiales de embalaje, medios de transporte, viajeros y sus equipajes y la dispersión natural de la plaga).	P	<i>Category : TECHNICAL (1753) Costa Rica (30 Sep 2023 4:48 AM)</i> Se repite en cuanto al texto de la sección 3.1.1 del Anexo 2.
483	El riesgo principal de introducción de plagas se da con los envíos importados de plantas y productos vegetales, sin embargo (especialmente para un ARP realizado para una plaga particular) también es necesario considerar el riesgo de introducción con otros tipos de vías, (por ejemplo, materiales de embalaje, medios de transporte, viajeros y sus equipajes y la dispersión natural de la plaga).	P	<i>Category : TECHNICAL (993) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Se repite en cuanto al texto de la sección 3.1.1 del Anexo 2.
488	aplicadas al envío; <u>- aplicadas dentro del país importador;</u>	P	<i>Category : TECHNICAL (994) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (23 ago 2023 7:35) Para incluir todas las opciones mencionadas en las secciones posteriores
497	Las opciones de manejo del riesgo de plagas que se indican a continuación son ejemplos de las medidas que se aplican más frecuentemente a los artículos reglamentados en el comercio. Se aplican a las vías, generalmente envíos de un hospedante, desde un origen determinado y pueden ser independientes o formar parte de un enfoque de sistemas. La lista de opciones no es exhaustiva y comprende medidas que tal vez ya se consideren parte de las prácticas de producción comercial o se impongan como medidas fitosanitarias para lograr el nivel adecuado de protección del país al término del proceso de ARP. <u>4.5.1. Opciones para asegurar que el área, lugar de producción o sitio de producción están libres de la plaga</u> Las medidas podrán incluir: <u>áreas libres de plagas, lugares de producción libres de plagas y sitios de producción libres de plagas.</u> Los requisitos para el establecimiento de <u>áreas libres de plagas, lugares de producción libres de plagas y sitios de producción libres de plagas</u> se describen en varias NIMF (por ejemplo, la NIMF 4 [Requisitos para el establecimiento de <u>áreas libres de plagas</u>], la NIMF 10 [Requisitos para el establecimiento de <u>lugares de producción libres de plagas y sitios de producción libres de plagas</u>] y la NIMF 26 [<u>Establecimiento de áreas libres de plagas para moscas de la fruta (Tephritidae)</u>]).	P	<i>Category : TECHNICAL (1754) Costa Rica (30 Sep 2023 4:51 AM)</i> Incluye, Tomado de la NIMF 11 por consistencia y para facilitar la comprensión de acuerdo con las categorías descriptas en la sección 4.3
497	Las opciones de manejo del riesgo de plagas que se indican a continuación son	P	<i>Category : EDITORIAL (525) Nicaragua (27 Jul 2023 10:25</i>

	<p>ejemplos de las medidas que se aplican más frecuentemente a los artículos reglamentados en el comercio. Se aplican a las vías, generalmente envíos de un hospedante, desde un origen determinado y pueden ser independientes o formar parte de un enfoque de sistemas. La lista de opciones no es exhaustiva y comprende medidas que tal vez ya se consideren parte de las prácticas de producción comercial o se <u>impongan establezcan</u> como medidas fitosanitarias para lograr el nivel adecuado de protección del país al término del proceso de ARP.</p>		PM) Mejor compresión del texto
498	<p><u>4.5.1 2 Opciones previas a aplicadas para prevenir o reducir la plantación infestación</u></p> <p><u>4.5.2.1 Opciones antes de la plantación y durante el periodo de crecimiento</u></p>	P	<p>Category : TECHNICAL (1755) Costa Rica (30 Sep 2023 4:52 AM)</p> <p>Se agregó título para clasificar las opciones en las categorías mencionadas en la sección 4.3</p>
498	<p><u>4.5.1 Opciones para asegurar que el área, lugar de producción o sitio de producción están libres de la plaga</u></p> <p><u>Las medidas podrán incluir: áreas libres de plagas, lugares de producción libres de plagas y sitios de producción libres de plagas.</u></p> <p><u>Los requisitos para el establecimiento de áreas libres de plagas, lugares de producción libre de plagas y sitios de producción libres de plagas se describen en varias NIMF (por ejemplo, la NIMF 4 [Requisitos para el establecimiento de áreas libres de plagas], la NIMF 10 [Requisitos para el establecimiento de lugares de producción libres de plagas y sitios de producción libres de plagas] y la NIMF 26 [Establecimiento de áreas libres de plagas para moscas de la fruta (Tephritidae)]).</u></p> <p><u>4.5.2 Opciones aplicadas para prevenir o reducir la infestación original del cultivo</u></p> <p><u>4.5.2.1 Opciones previas a antes de la plantación plantación y durante el periodo de crecimiento</u></p>	P	<p>Category : EDITORIAL (995) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p> <p>Uruguay (23 ago 2023 2:29)</p> <p>Tomado de la NIMF 11 por consistencia y para facilitar la comprensión de acuerdo con las categorías descriptas en la sección 4.3</p> <p>Uruguay (23 ago 2023 7:08)</p> <p>Se agregó título para clasificar las opciones en las categorías mencionadas en la sección 4.3</p> <p>Uruguay (23 ago 2023 7:12)</p> <p>Modificado para incluir todas las opciones mencionadas</p>
500	<p><u>. Los requisitos para el establecimiento de áreas libres de plagas, lugares de producción libre de plagas y sitios de producción libres de plagas se describen en varias NIMF (por ejemplo, la NIMF 4 [Requisitos para el establecimiento de áreas libres de plagas], la NIMF 12 [Certificados fitosanitarios] y la NIMF 26 [Establecimiento de áreas libres de plagas para moscas de la fruta (Tephritidae)])</u>.</p>	P	<p>Category : TECHNICAL (1756) Costa Rica (30 Sep 2023 4:53 AM)</p> <p>Párrafo incluido en la sección correspondientes a las opciones dirigidas a asegurar áreas, lugares o sitios libres de plagas</p>
500	<p><u>Los requisitos para el establecimiento de áreas libres de plagas, lugares de producción libre de plagas y sitios de producción libres de plagas se describen en</u></p>	P	<p>Category : TECHNICAL (996) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</p>

	<i>varias NIMF (por ejemplo, la NIMF 4 [Requisitos para el establecimiento de áreas libres de plagas], la NIMF 12 [Certificados fitosanitarios] y la NIMF 26 [Establecimiento de áreas libres de plagas para moscas de la fruta (Tephritidae)]).</i>		Uruguay (23 ago 2023 7:10) Párrafo incluido en la sección correspondientes a las opciones dirigidas a asegurar áreas, lugares o sitios libres de plagas
500	Los requisitos para el establecimiento de áreas libres de plagas, lugares de producción libre de plagas y sitios de producción libres de plagas se describen en varias NIMF (por ejemplo, la NIMF 4 [Requisitos para el establecimiento de áreas libres de plagas], <u>NIMF 10 [requisitos para el establecimiento de lugares de producción y sitios de producción libres de plagas]</u> , la NIMF 12 [Certificados fitosanitarios] y la NIMF 26 [Establecimiento de áreas libres de plagas para moscas de la fruta (Tephritidae)]).	P	<i>Category : TECHNICAL (537) OIRSA (27 Jul 2023 10:59 PM)</i> incorporación de NIMF 10
502	4.5.2 22 Opciones previas a la cosecha	P	<i>Category : EDITORIAL (1757) Costa Rica (30 Sep 2023 4:53 AM)</i> por el cambio efectuado
502	4.5.2.2 Opciones previas a la cosecha	P	<i>Category : EDITORIAL (997) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (23 ago 2023 7:18) Cambio editorial como consecuencia de cambios anteriores
505	4.5.2.3 Opciones en la cosecha	P	<i>Category : EDITORIAL (1758) Costa Rica (30 Sep 2023 4:54 AM)</i>
505	4.5.2.3 Opciones en la cosecha	P	<i>Category : EDITORIAL (998) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (23 ago 2023 7:18) Cambio editorial como consecuencia de cambios anteriores
511	4.5.2.4 Opciones posteriores a la cosecha	P	<i>Category : EDITORIAL (1759) Costa Rica (30 Sep 2023 4:55 AM)</i>
511	4.5.2.4 Opciones posteriores a la cosecha	P	<i>Category : EDITORIAL (999) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (23 ago 2023 7:18) Cambio editorial como consecuencia de cambios anteriores

516	eliminación de las hojas, los tallos o la corteza. <u>5.4.3 Opciones aplicadas al envío</u> Las medidas pueden incluir cualquier combinación de las opciones siguientes:- inspección o pruebas para verificar la ausencia de una plaga o de la tolerancia a una plaga determinada; el tamaño de la muestra deberá ser adecuado para que dé como resultado una probabilidad aceptable de detección de la plaga- prohibición de partes de la especie hospedante- condiciones especificadas de preparación del envío (por ejemplo manipulación para prevenir la infestación o reinfección)- tratamiento especificado del envío - los tratamientos pueden incluir métodos químicos, térmicos, de irradiación u otros métodos físicos.	P	Category : TECHNICAL (1760) Costa Rica (30 Sep 2023 4:55 AM) Texto de la NIMF 11 incluido para completar las categorías descriptas en la sección 4.3
517	<u>4.5.3 Opciones aplicadas al envío</u> Las medidas pueden incluir cualquier combinación de las opciones siguientes: - inspección o pruebas para verificar la ausencia de una plaga o de la tolerancia a una plaga determinada; el tamaño de la muestra deberá ser adecuado para que dé como resultado una probabilidad aceptable de detección de la plaga - prohibición de partes de la especie hospedante - condiciones especificadas de preparación del envío (por ejemplo manipulación para prevenir la infestación o reinfección) - tratamiento especificado del envío - los tratamientos pueden incluir métodos químicos, térmicos, de irradiación u otros métodos físicos. 4.5.4 Opciones posteriores a la entrada dentro del país importador	P	Category : TECHNICAL (1000) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 7:31) Texto de la NIMF 11 incluido para completar las categorías descriptas en la sección 4.3 Uruguay (23 ago 2023 7:34) Título mas preciso para la sección
519	cuarentena posentrada utilizada para las plantas para plantar (esta puede ser la única opción para determinadas plagas que no son detectables en el momento de la entrada) dependiendo del ciclo biológico de la plaga y fenología de la planta, con el fin de evitar demoras indebidas;	P	Category : TECHNICAL (1001) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) OIRSA (15 ago 2023 8:24) mejor redacción del párrafo
519	cuarentena posentrada utilizada para las plantas para plantar (esta puede ser la	P	Category : TECHNICAL

	única opción para determinadas plagas que no son detectables en el momento de la entrada); <u>dependiendo del ciclo biológico de la plaga y fenología de la planta, con el fin de evitar demoras indebidas.</u>		(526) OIRSA (27 Jul 2023 10:34 PM) mejor redacción del párrafo
523	4.5.6 Otras opciones de interés para todos los pasos	P	<i>Category : TECHNICAL (1761) Costa Rica (30 Sep 2023 4:59 AM)</i> Se sugiere eliminar toda la sección. Esta sección es redundante por que están incluidas en las secciones anteriores
524	4.5.6.1 Pruebas	P	<i>Category : TECHNICAL (1762) Costa Rica (30 Sep 2023 4:59 AM)</i> redundante por que están incluidas en las secciones anteriores
525	<u>Algunas plagas como los patógenos podrán infestar una planta sin producir síntomas o con síntomas enmascarados y, por consiguiente, podrá ser necesario realizar pruebas basadas en el muestreo.</u>	P	<i>Category : TECHNICAL (1763) Costa Rica (30 Sep 2023 5:00 AM)</i> redundante por que están incluidas en las secciones anteriores
526	<u>Incluso aunque haya síntomas, podrá ser necesario realizar este tipo de pruebas a fin de identificar o confirmar el agente causal.</u>	P	<i>Category : TECHNICAL (1765) Costa Rica (30 Sep 2023 5:00 AM)</i> redundante por que están incluidas en las secciones anteriores
527	4.5.6.2 Tratamientos	P	<i>Category : TECHNICAL (1766) Costa Rica (30 Sep 2023 5:00 AM)</i> redundante por que están incluidas en las secciones anteriores
528	<u>Podrán aplicarse tratamientos en diversas etapas del ciclo de producción para mitigar el riesgo de plagas. Los tratamientos se podrán aplicar individualmente o en combinación con otros tratamientos o medidas.</u>	P	<i>Category : TECHNICAL (1764) Costa Rica (30 Sep 2023 5:00 AM)</i> redundante por que están incluidas en las secciones anteriores
529	<u>:Cabe citar, por ejemplo:</u>	P	<i>Category : TECHNICAL (1767) Costa Rica (30 Sep 2023 5:00 AM)</i> redundante por que están incluidas en las secciones anteriores
531	tratamientos químicos (por ejemplo, la aplicación de fumigantes, aerosoles, nebulizadores, nieblas, <u>inmersión</u> , polvos, baños, gránulos y rociados);	P	<i>Category : TECHNICAL (1002) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> OIRSA (15 ago 2023 8:24) incluir tratamiento de inmersión

531	tratamientos químicos (por ejemplo, la aplicación de fumigantes, aerosoles, nebulizadores, nieblas, polvos, <u>inmersión</u> , baños, gránulos y rociados);	P	<i>Category : TECHNICAL (528) Nicaragua (27 Jul 2023 10:38 PM)</i> Incluir más opciones de tratamiento químico
531	tratamientos químicos (por ejemplo, la aplicación de fumigantes, aerosoles, nebulizadores, nieblas, polvos, <u>inmersión</u> , baños, gránulos y rociados);	P	<i>Category : TECHNICAL (527) OIRSA (27 Jul 2023 10:37 PM)</i> incluir tratamiento de inmersión
535	control biológico.	P	<i>Category : TECHNICAL (531) OIRSA (27 Jul 2023 10:53 PM)</i> Ya se encuentra incluido en la etapa apropiada (precosecha)
536	4.5.6.4 Inspección	P	<i>Category : TECHNICAL (1768) Costa Rica (30 Sep 2023 5:01 AM)</i> redundante por que están incluidas en las secciones anteriores
536	4.5.6.4 3 Inspección	P	<i>Category : EDITORIAL (530) Nicaragua (27 Jul 2023 10:42 PM)</i> Corrección de cronológico
536	4.5.6.4 3 Inspección	P	<i>Category : EDITORIAL (529) OIRSA (27 Jul 2023 10:41 PM)</i> Revisar numeración
537	<i>La inspección se podrá utilizar como medida fitosanitaria o para comprobar la eficacia de las medidas fitosanitarias. Los factores que se deben considerar al decidir si utilizar la inspección como medida fitosanitaria se describen en la NIMF 23 (Directrices para la inspección).</i>	P	<i>Category : TECHNICAL (1769) Costa Rica (30 Sep 2023 5:01 AM)</i> redundante por que están incluidas en las secciones anteriores
537	La inspección se podrá utilizar como medida fitosanitaria o para <i>comprobar la eficacia de determinar el cumplimiento con las medidas reglamentaciones</i> fitosanitarias. Los factores que se deben considerar al decidir si utilizar la inspección como medida fitosanitaria se describen en la NIMF 23 (<i>Directrices para la inspección</i>).	P	<i>Category : TECHNICAL (1003) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Se sugieren modificaciones según la definición de inspección en la NIMF 5.
539	<i>Los enfoques Las opciones de manejo de riesgo de plagas pueden integrarse en un enfoque de sistemas ofrecen una forma posible de abordar la variabilidad y la incertidumbre de cada medida combinando varias de ellas para encontrar lograr el nivel de riesgo de plagas considerado aceptable.</i>	P	<i>Category : TECHNICAL (1770) Costa Rica (30 Sep 2023 5:02 AM)</i> Para clarificar e introducir al enfoque de sistemas como una opción del manejo de riesgo de plagas
539	<i>Las opciones de manejo de riesgo de plagas pueden integrarse en un enfoque de sistemas. Los enfoques de sistemas ofrecen una forma posible de abordar la variabilidad y la incertidumbre de cada medida combinando varias de ellas para lograr el nivel de</i>	P	<i>Category : TECHNICAL (1004) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (23 ago 2023 7:52)

	<p><u>riesgo de plagas considerado aceptable. Los enfoques de sistemas ofrecen una forma posible de abordar la variabilidad y la incertidumbre de cada medida combinando varias de ellas para encontrar el nivel de riesgo de plagas considerado aceptable.</u></p>		Para clarificar e introducir al enfoque de sistemas como una opción del manejo de riesgo de plagas
540	<p>En la NIMF 14 (<i>Aplicación de medidas integradas en un enfoque de sistemas para el manejo del riesgo de plagas</i>) se proporciona orientación sobre la elaboración y evaluación de los enfoques de sistemas. <u>En la NIMF 35 (Enfoque de sistemas para el manejo de riesgo de plagas de moscas de la fruta Tephritidae) se proporciona orientación sobre el desarrollo, implementación y verificación de medidas integradas en un enfoque de sistemas como una opción para el manejo del riesgo de plagas de moscas de la fruta</u></p>	P	<p>Category : TECHNICAL (1771) Costa Rica (30 Sep 2023 5:03 AM) Para incluir todas las normas relacionadas con los Enfoques de sistemas</p>
540	<p>En la NIMF 14 (<i>Aplicación de medidas integradas en un enfoque de sistemas para el manejo del riesgo de plagas</i>) se proporciona orientación sobre la elaboración y evaluación de los enfoques de sistemas.</p> <p><u>En la NIMF 35 (Enfoque de sistemas para el manejo de riesgo de plagas de moscas de la fruta Tephritidae) se proporciona orientación sobre el desarrollo, implementación y verificación de medidas integradas en un enfoque de sistemas como una opción para el manejo del riesgo de plagas de moscas de la fruta.</u></p>	P	<p>Category : TECHNICAL (1005) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:00) Para incluir todas las normas relacionadas con los Enfoques de sistemas</p>
541	<p>En la NIMF 36 (<i>Medidas integradas para plantas para plantar</i>) se proporciona orientación específica sobre el uso de medidas integradas para gestionar el riesgo derivado de las plantas para plantar en el comercio internacional.</p> <p><u>x.x Prohibición</u></p> <p><u>Solo se debería optar por la prohibición cuando no haya ninguna otra opción disponible. Antes de optar por la prohibición (véase la NIMF 20 [Directrices sobre un sistema fitosanitario de reglamentación de importaciones]), deberían considerarse otras opciones menos restrictivas del comercio que proporcionen un nivel adecuado de protección.</u></p> <p><u>Las prohibiciones de importación podrán aplicarse a determinados productos, orígenes y fases fisiológicas (por ejemplo, plantas en período de reposo) o solamente durante estaciones concretas (por ejemplo, durante la etapa de vuelo de los insectos).</u></p>	P	<p>Category : TECHNICAL (1774) Costa Rica (30 Sep 2023 5:12 AM) Se propone mover esta sección siendo que la prohibición es una medida fitosanitaria y las opciones que se indican a continuación pueden ser otros requisitos que se incluyen en un enfoque de sistemas</p>
542	<p>4.5.8 Otras opciones<u>Otros requerimientos relacionados al manejo del</u></p>	P	<p>Category : TECHNICAL</p>

	<u>riesgo</u>		(1772) Costa Rica (30 Sep 2023 5:04 AM) Se sugiere cambio de título y mover esta sección luego el Item de Prohibición, siendo que la prohibición es una medida fitosanitaria y las opciones indicadas. no son opciones de manejo de riesgo de plagas sino más bien otros requisitos que podrían ser parte de un enfoque de sistemas
542	4.5.8 Otros requerimientos relacionado al manejo del riesgo	C	<i>Category : SUBSTANTIVE</i> (1007) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se propone mover esta sección luego el Item de Prohibición, siendo que la prohibición es una medida fitosanitaria.
542	4.5.8 Otras opciones8 Otros requerimientos relacionado al manejo del riesgo	P	<i>Category : SUBSTANTIVE</i> (1006) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se sugiere cambio de título para diferencias que lo mencionado a continuación NO son medidas fitosanitarias.
543	<u>Podrá ser necesario aplicar otras medidas fitosanitarias para proporcionar garantía, verificación, supervisión y protección contra la infestación o la contaminación o para permitir la trazabilidad.</u> <u>Otros requerimientos que podrían proporcionar garantía, verificación, supervisión y protección contra la infestación o la contaminación o para permitir la rastreabilidad.</u>	P	<i>Category : TECHNICAL</i> (1773) Costa Rica (30 Sep 2023 5:06 AM) Se propone cambiar el texto en función del nuevo título propuesto, y ajustar la traducción de "trazabilidad", por "rastreabilidad".
543	<u>Podrá ser necesario aplicar otras medidas fitosanitarias para proporcionar garantía, verificación, supervisión y protección contra la infestación o la contaminación o para permitir la trazabilidad.</u> <u>Otros requerimientos que podrían proporcionar garantía, verificación, supervisión y protección contra la infestación o la contaminación o para permitir la rastreabilidad.</u>	P	<i>Category : SUBSTANTIVE</i> (1008) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Se propone cambiar el texto en función del nuevo título propuesto, y ajustar la traducción de "trazabilidad", por "rastreabilidad".
543	Podrá ser necesario aplicar otras medidas fitosanitarias para proporcionar garantía, verificación, supervisión y protección contra la infestación o la contaminación o para permitir la <u>trazabilidad</u> <u>rastreabilidad</u> .	P	<i>Category : TECHNICAL</i> (533) Dominican Republic (27 Jul 2023 10:55 PM)
543	Podrá ser necesario aplicar otras medidas fitosanitarias para proporcionar garantía, verificación, supervisión y protección contra la infestación o la contaminación o para permitir la <u>trazabilidad</u> <u>rastreabilidad</u> .	P	<i>Category : TECHNICAL</i> (532) OIRSA (27 Jul 2023 10:54 PM) en consistencia con todo el cuerpo de la norma
549	la segregación y la garantía del <u>embalaje</u> <u>empaque</u> después del tratamiento.	P	<i>Category : TRANSLATION</i> (1009) IPPC Regional Workshop Latin

			America (18 Sep 2023 8:25 PM)
549	la segregación y la garantía del <u>embalaje-empaque</u> después del tratamiento.	P	Category : TECHNICAL (535) Dominican Republic (27 Jul 2023 10:56 PM)
549	la segregación y la garantía del <u>embalaje-empaque</u> después del tratamiento.	P	Category : TECHNICAL (534) OIRSA (27 Jul 2023 10:55 PM) en consistencia con el cuerpo de la norma
550	4.6 Prohibición	P	Category : TECHNICAL (1775) Costa Rica (30 Sep 2023 5:13 AM) Moverlo antes de Otras opciones
552	Las prohibiciones de importación podrán aplicarse a determinados productos, <u>procedencias-orígenes</u> y fases fisiológicas (por ejemplo, plantas en período de reposo) o solamente durante estaciones concretas (por ejemplo, durante la etapa de vuelo de los insectos).	P	Category : TRANSLATION (1010) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) OIRSA (15 ago 2023 8:27) uso correcto del término
552	Las prohibiciones de importación podrán aplicarse a determinados productos, <u>procedencias-orígenes</u> y fases fisiológicas (por ejemplo, plantas en período de reposo) o solamente durante estaciones concretas (por ejemplo, durante la etapa de vuelo de los insectos).	P	Category : TECHNICAL (536) OIRSA (27 Jul 2023 10:57 PM) uso correcto del término
554	<u>Las opciones de manejo del riesgo de plagas se deberían evaluar en función de su efectividad para reducir la probabilidad de introducción y dispersión de la plaga de que se trate. Para poderlas establecer como medidas fitosanitarias, opciones de manejo de riesgo de plagas identificadas no solo deberían ser eficaces, sino que también deberían ser viables y tener repercusiones mínimas en el movimiento internacional de productos y medios de transporte. Las medidas establecidas como opciones de manejo del riesgo de plagas se deberían evaluar en función de su eficacia para reducir la probabilidad de introducción y dispersión de la plaga de que se trate. Para poderlas establecer como medidas fitosanitarias, las medidas no solo deberían ser eficaces, sino que también deberían ser viables y tener repercusiones mínimas en el movimiento internacional de productos y medios de transporte.</u>	P	Category : TECHNICAL (1776) Costa Rica (30 Sep 2023 5:15 AM) Termino correcto en español La traducción más apropiada para "effectiveness" seria efectividad Por consistencia con el titulo de la sección
554	Las <u>medidas establecidas como</u> opciones de manejo del riesgo de plagas se deberían evaluar en función de su <u>eficacia-efectividad</u> para reducir la probabilidad de introducción y dispersión de la plaga de que se trate. Para poderlas establecer como medidas fitosanitarias, las <u>medidas opciones de manejo de riesgo de plagas</u>	P	Category : TECHNICAL (1011) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) La traducción más apropiada para "effectiveness" seria efectividad

	<u>identificadas</u> no solo deberían ser eficaces, sino que también deberían ser viables y tener repercusiones mínimas en el movimiento internacional de productos y medios de transporte.		Uruguay (23 ago 2023 8:06) Por consistencia con el título de la sección
555	5.1 <u>EficaciaEfectividad</u>	P	Category : TECHNICAL (1777) Costa Rica (30 Sep 2023 5:18 AM) Eficacia se aplica por lo general a tratamientos en tanto que efectividad (effectiveness en inglés) se aplica en referencia a las medidas
555	5.1 <u>EficaciaEfectividad</u>	P	Category : TRANSLATION (1012) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:14) Eficacia se aplica por lo general a tratamientos en tanto que efectividad (effectiveness en inglés) se aplica en referencia a las medidas
555	5.1 <u>EficaciaEfectividad de la medida</u>	P	Category : TECHNICAL (540) Nicaragua (27 Jul 2023 11:06 PM) Uso del término adecuado
555	5.1 <u>EficaciaEfectividad de la medida</u>	P	Category : TECHNICAL (538) OIRSA (27 Jul 2023 11:05 PM) Uso correcto del término
556	La <u>eficacia-efectividad</u> es una expresión del grado en que una medida determinada reduce el riesgo de plagas. <u>La descripción de la eficacia comprende la especificación de la respuesta o criterio de valoración (por ejemplo, la mortalidad) deseados y una medida de ellos.</u>	P	Category : TECHNICAL (1778) Costa Rica (30 Sep 2023 5:18 AM) Se sugiere eliminar dado que la frase refiere a tratamientos y la sección refiere a la efectividad de las medidas en general
556	<u>La efectividad es una expresión del grado en que una medida determinada reduce el riesgo de plagas. La eficacia es una expresión del grado en que una medida determinada reduce el riesgo de plagas. La descripción de la eficacia comprende la especificación de la respuesta o criterio de valoración (por ejemplo, la mortalidad) deseados y una medida de ellos.</u>	P	Category : TECHNICAL (1013) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:16) Se sugiere eliminar dado que la frase refiere a tratamientos y la sección refiere a la efectividad de las medidas en general
556	La <u>eficacia-efectividad de la medida</u> es una expresión del grado en que una medida determinada reduce el riesgo de plagas. La descripción de la eficacia comprende la especificación de la respuesta o criterio de valoración (por ejemplo, la mortalidad) deseados y una medida de ellos.	P	Category : TECHNICAL (541) Nicaragua (27 Jul 2023 11:06 PM) Término adecuado

556	La <u>eficacia-efectividad de la medida</u> es una expresión del grado en que una medida determinada reduce el riesgo de plagas. La descripción de la eficacia comprende la especificación de la respuesta o criterio de valoración (por ejemplo, la mortalidad) deseados y una medida de ellos.	P	<i>Category : TECHNICAL (539) OIRSA (27 Jul 2023 11:06 PM)</i> en consistencia con el título
557	Cuando proceda, la <u>eficacia-efectividad</u> se podrá expresar en términos cuantitativos que incluyan los parámetros estadísticos habituales (por ejemplo, el intervalo de confianza). Cuando resulte imposible o inviable hacer este cálculo, la <u>eficacia-efectividad</u> se podrá expresar en términos cualitativos como “alta”, “media” y “baja”.	P	<i>Category : TECHNICAL (1779) Costa Rica (30 Sep 2023 5:19 AM)</i> por consistencia
557	Cuando proceda, la <u>eficacia-efectividad</u> se podrá expresar en términos cuantitativos que incluyan los parámetros estadísticos habituales (por ejemplo, el intervalo de confianza). Cuando resulte imposible o inviable hacer este cálculo, la <u>eficacia-efectividad</u> se podrá expresar en términos cualitativos como “alta”, “media” y “baja”.	P	<i>Category : TRANSLATION (1014) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Eficacia se aplica por lo general a tratamientos en tanto que efectividad (effectiveness en inglés) se aplica en referencia a las medidas
558	Se deberían tener en cuenta varios factores a la hora de determinar la <u>eficacia-efectividad</u> requerida de una medida. Estos factores son los siguientes:	P	<i>Category : TECHNICAL (1780) Costa Rica (30 Sep 2023 5:20 AM)</i> por consistencia
558	Se deberían tener en cuenta varios factores a la hora de determinar la <u>eficacia-efectividad</u> requerida de una medida. Estos factores son los siguientes:	P	<i>Category : TRANSLATION (1015) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i>
561	<u>el tipo de riesgo de plagas que se está abordando;</u>	P	<i>Category : TECHNICAL (1781) Costa Rica (30 Sep 2023 5:21 AM)</i> Se sugiere suprimir debido a que no está claro a que se refiere con "tipo" de riesgo o "nature" en la versión en inglés.
561	<u>el tipo de riesgo de plagas que se está abordando;</u>	P	<i>Category : TECHNICAL (1016) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Se sugiere suprimir debido a que no está claro a que se refiere con "tipo" de riesgo o "nature" en la versión en inglés.
562	la biología de la plaga o <u>plagas que se está manejando;plagas</u>	P	<i>Category : TECHNICAL (1782) Costa Rica (30 Sep 2023 5:21 AM)</i>
562	la biología de la plaga o <u>plagas que se está manejando;plagas;</u>	P	<i>Category : TECHNICAL (1017) IPPC Regional Workshop Latin</i>

			America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:18) No se refiere al manejo de la plaga sino al manejo del riesgo
564	Los parámetros que se podrán emplear para determinar la <u>eficacia_efectividad</u> de las medidas son:	P	<i>Category : TECHNICAL (1783) Costa Rica (30 Sep 2023 5:22 AM)</i> por consistencia
564	Los parámetros que se podrán emplear para determinar la <u>eficacia_efectividad</u> de las medidas son:	P	<i>Category : TRANSLATION (1018) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i>
568	<u>Es posible que algunas medidas no afecten directamente a la mortalidad de la plaga. Algunas consideraciones que se deben tener en cuenta para su evaluación son las siguientes:</u>	P	<i>Category : TECHNICAL (1784) Costa Rica (30 Sep 2023 5:23 AM)</i> Se sugiere eliminar el texto así como las viñetas que siguen a continuación dado que no proporciona orientación específica en relación a la efectividad de las medidas
568	Es posible que algunas medidas no afecten directamente a la mortalidad de la plaga. <u>Algunas consideraciones que se deben tener en cuenta para su evaluación son las siguientes:</u>	P	<i>Category : SUBSTANTIVE (1716) Peru (29 Sep 2023 10:45 PM)</i> No proporciona lineamiento adicional. Solo te deriva a las demás NIMFs y dirigido al tratamiento
568	<u>Es posible que algunas medidas no afecten directamente a la mortalidad de la plaga. Algunas consideraciones que se deben tener en cuenta para su evaluación son las siguientes:</u>	C	<i>Category : SUBSTANTIVE (1019) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (23 ago 2023 8:21) Se sugiere eliminar el texto así como las viñetas que siguen a continuación dado que no proporciona orientación específica en relación a la efectividad de las medidas
569	<u>en respecto a la vigilancia y el seguimiento: métodos apropiados de prospección, intensidad del seguimiento, capacidad de detectar la plaga (véase la NIMF 6 [Vigilancia]);</u>	P	<i>Category : TECHNICAL (1785) Costa Rica (30 Sep 2023 5:24 AM)</i> Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas
570	<u>en respecto a los conceptos relacionados con la ausencia de plagas: véanse la NIMF 4, la NIMF 10 y la NIMF 26;</u>	P	<i>Category : TECHNICAL (1786) Costa Rica (30 Sep 2023 5:24 AM)</i> Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas

571	en respecto a los enfoques de sistemas: véanse la NIMF 14 y la NIMF 35 (<i>Enfoque de sistemas para el manejo del riesgo de plagas de moscas de la fruta [Tephritidae]</i>);	P	<p><i>Category : TECHNICAL</i> (1791) Costa Rica (30 Sep 2023 5:25 AM) Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas</p>
571	en respecto a los enfoques de sistemas: véanse la NIMF 14 y la NIMF 35 (<i>Enfoque de sistemas para el manejo del riesgo de plagas de moscas de la fruta [Tephritidae]</i>);	P	<p><i>Category : TECHNICAL</i> (1787) Costa Rica (30 Sep 2023 5:24 AM) Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas</p>
573	en respecto a las pruebas: disponibilidad y fiabilidad de los métodos de prueba, acreditación de laboratorios, validación de la metodología (por ejemplo, la NIMF 27 [<i>Protocolos de diagnóstico para las plagas reglamentadas</i>]);	P	<p><i>Category : TECHNICAL</i> (1788) Costa Rica (30 Sep 2023 5:25 AM) Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas</p>
574	en respecto a los tratamientos de irradiación: véase la NIMF 18 [<i>Requisitos para el uso de la irradiación como medida fitosanitaria</i>];	P	<p><i>Category : TECHNICAL</i> (1789) Costa Rica (30 Sep 2023 5:25 AM) Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas</p>
575	en respecto al muestreo: nivel de confianza de la detección de la plaga con un tamaño de muestra determinado (véase la NIMF 31 [<i>Metodologías para muestreo de envíos</i>]);	P	<p><i>Category : TECHNICAL</i> (1790) Costa Rica (30 Sep 2023 5:25 AM) Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas</p>
576	en respecto a la inspección: capacidad de detectar la plaga en el producto (véase la NIMF 23);	P	<p><i>Category : TECHNICAL</i> (1792) Costa Rica (30 Sep 2023 5:25 AM) Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas</p>
577	en respecto a las medidas posentrada: véase la NIMF 36.	P	<p><i>Category : TECHNICAL</i> (1793) Costa Rica (30 Sep 2023 5:26 AM) Se sugiere eliminar as viñetas dado que no proporciona orientación específica en relación a la efectividad de las medidas</p>
580	Debería indicarse la <u>respuesta o el criterio de valoración requeridos respuesta requerida</u> para los tratamientos, además de la eficacia requerida. Entre las	P	<p><i>Category : TECHNICAL</i> (1794) Costa Rica (30 Sep 2023 5:27 AM)</p>

	respuestas o criterios de valoración figuran los siguientes:		Por consistencia con otras NIMF que mencionan la respuesta requerida (por ejemplo NIMF 18)
580	Debería indicarse la respuesta o el criterio de valoración requerido para los tratamientos, además de la eficacia requerida. Entre las respuestas o criterios de valoración figuran los las siguientes:	P	<i>Category : TECHNICAL (1020) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:27) Por consistencia con otras NIMF que mencionan la respuesta requerida (por ejemplo NIMF 18)</i>
586	El análisis Probit se ha utilizado para establecer la eficacia de tratamientos de alta mortalidad para determinadas plagas. Los tratamientos de alta mortalidad generalmente se aplican como una medida única a combinaciones específicas de productos y plagas. Es posible que los tratamientos con una elevada mortalidad no sean viables o no estén técnicamente justificados, por ejemplo:	P	<i>Category : TECHNICAL (1021) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:33) Texto tomado del borrador de manejo de riesgo de plagas para proporcionar una introducción al texto que sigue relacionado con los tratamientos de alta mortalidad</i>
591	Al evaluar las medidas como opciones de manejo del riesgo de plagas, se deberían determinar y considerar las repercusiones ambientales económicas , sociales y ambientales que dichas medidas podrían tener. Las ONPF de los países importadores deberían examinar estas repercusiones con las ONPF de los países exportadores.	P	<i>Category : EDITORIAL (1022) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) se repite "ambientales"</i>
591	Al evaluar las medidas como opciones de manejo del riesgo de plagas, se deberían determinar y considerar las repercusiones ambientales económicas , sociales y ambientales que dichas medidas podrían tener. Las ONPF de los países importadores deberían examinar estas repercusiones con las ONPF de los países exportadores.	P	<i>Category : TECHNICAL (545) Dominican Republic (27 Jul 2023 11:11 PM)</i>
591	Al evaluar las medidas como opciones de manejo del riesgo de plagas, se deberían determinar y considerar las repercusiones ambientales económicas , sociales y ambientales que dichas medidas podrían tener. Las ONPF de los países importadores deberían examinar estas repercusiones con las ONPF de los países exportadores.	P	<i>Category : TECHNICAL (543) OIRSA (27 Jul 2023 11:10 PM) termino apropiado</i>
595	pueda haber reservas en materia de salud pública o restricciones reglamentarias en relación con una técnica de control de en particular;	P	<i>Category : TECHNICAL (546) Dominican Republic (27 Jul 2023 11:12 PM)</i>
595	pueda haber reservas en materia de salud pública o restricciones reglamentarias en relación con una técnica de control de en particular;	P	<i>Category : EDITORIAL (544) OIRSA (27 Jul 2023 11:11 PM)</i>

598	Las opciones de manejo del riesgo de plagas podrán ser difíciles de evaluar si se detecta un nivel considerable de incertidumbre en la evaluación del riesgo de plagas. <i>Incluso en el caso de que se identifique la incertidumbre, las medidas fitosanitarias no se deberían aplicar a menos que la información disponible indique que el riesgo de plagas es inaceptable.</i>	P	<i>Category : TECHNICAL (1023) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> OIRSA (15 ago 2023 8:28) para dar sentido a la idea del párrafo y no caer en contradicción con el párrafo siguiente
598	Las opciones de manejo del riesgo de plagas podrán ser difíciles de evaluar si se detecta un nivel considerable de incertidumbre en la evaluación del riesgo de plagas. <i>Incluso en el caso de que se identifique la incertidumbre, las medidas fitosanitarias no se deberían aplicar a menos que la información disponible indique que el riesgo de plagas es inaceptable.</i>	P	<i>Category : TECHNICAL (548) Nicaragua (27 Jul 2023 11:23 PM)</i> Texto contradictorio
598	Las opciones de manejo del riesgo de plagas podrán ser difíciles de evaluar si se detecta un nivel considerable de incertidumbre en la evaluación del riesgo de plagas. <i>Incluso en el caso de que se identifique la incertidumbre, las medidas fitosanitarias no se deberían aplicar a menos que la información disponible indique que el riesgo de plagas es inaceptable.</i>	P	<i>Category : TECHNICAL (547) OIRSA (27 Jul 2023 11:18 PM)</i> para dar sentido a la idea del párrafo y no caer en contradicción con el párrafo siguiente
605	los efectos negativos de <u>los tratamientos-las medidas</u> en el producto (por ejemplo, la fitotoxicidad, el daño físico y la reducción de la vida útil);	P	<i>Category : TECHNICAL (1024) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i> Uruguay (23 ago 2023 8:37) Los tratamientos son una opción de medidas
609	si el tratamiento en cuestión está aprobado para su uso; <u>por ejemplo:</u> (<u>Identificación del/ los blanco (s) biológico (s) según ensayo de eficacia</u>).	P	<i>Category : TECHNICAL (568) CA (12 Aug 2023 2:36 AM)</i> Se podría aclarar el concepto de uso del tratamiento
612	Una vez determinadas y evaluadas las posibles opciones de manejo del riesgo de plagas en función de su <u>eficacia-efectividad</u> , su viabilidad y sus repercusiones, se podrán seleccionar las que se establecerán como medidas fitosanitarias.	P	<i>Category : TECHNICAL (1795) Costa Rica (30 Sep 2023 5:29 AM)</i>
612	Una vez determinadas y evaluadas las posibles opciones de manejo del riesgo de plagas en función de su <u>eficacia-efectividad</u> , su viabilidad y sus repercusiones, se podrán seleccionar las que se establecerán como medidas fitosanitarias.	P	<i>Category : TRANSLATION (1025) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i>
614	Dependiendo de la <u>eficacia-efectividad</u> de las medidas y del nivel adecuado de protección, se podrán seleccionar una o más medidas fitosanitarias.	P	<i>Category : TECHNICAL (1796) Costa Rica (30 Sep 2023 5:29 AM)</i>
615	Las medidas fitosanitarias que sean <u>eficaces-efectivas</u> contra una plaga cuarentenaria también podrán serlo contra otras plagas cuarentenarias. Por consiguiente, una única medida fitosanitaria podrá mitigar el riesgo de plagas de	P	<i>Category : TRANSLATION (1026) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i>

	múltiples plagas cuarentenarias.		
616	Si la ONPF del país o países importadores establece más de una medida fitosanitaria apropiada para gestionar el riesgo de plagas, todas estas medidas deberían considerarse equivalentes y publicarse como opciones en los requisitos fitosanitarios de importación del país del país o remitirse a las ONPF de los países exportadores.	P	<i>Category : EDITORIAL (1027) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM)</i>
616	Si la ONPF del país o países importadores establece más de una medida fitosanitaria apropiada para gestionar el riesgo de plagas, todas estas medidas deberían considerarse equivalentes y publicarse como opciones en los requisitos fitosanitarios de importación del país-del país-país o remitirse a las ONPF de los países exportadores.	P	<i>Category : EDITORIAL (550) Nicaragua (27 Jul 2023 11:27 PM) Repetido</i>
616	Si la ONPF del país o países importadores establece más de una medida fitosanitaria apropiada para gestionar el riesgo de plagas, todas estas medidas deberían considerarse equivalentes y publicarse como opciones en los requisitos fitosanitarios de importación del país del país o remitirse a las ONPF de los países exportadores.	P	<i>Category : EDITORIAL (549) OIRSA (27 Jul 2023 11:26 PM)</i>
620	Las opciones seleccionadas de manejo del riesgo de plagas podrán sentar las bases de las reglamentaciones fitosanitarias o los requisitos fitosanitarios de importación para el área reglamentada .	C	<i>Category : EDITORIAL (1028) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:45) Area reglamentada no debe ir en negrita</i>
625	las medidas fitosanitarias seleccionadas ; y	P	<i>Category : EDITORIAL (551) OIRSA (27 Jul 2023 11:29 PM)</i>
634	El país importador podrá llevar a cabo actividades de seguimiento de las vías a fin de determinar la eficacia de las medidas fitosanitarias y realizar <u>auditorías evaluaciones</u> de los sistemas para verificar la aplicación de medidas fitosanitarias.	P	<i>Category : TECHNICAL (553) Nicaragua (27 Jul 2023 11:33 PM) En concordancia con el cuerpo de la norma</i>
634	El país importador podrá llevar a cabo actividades de seguimiento de las vías a fin de determinar la eficacia de las medidas fitosanitarias y realizar <u>auditorías evaluaciones</u> de los sistemas para verificar la aplicación de medidas fitosanitarias.	P	<i>Category : TECHNICAL (554) Dominican Republic (27 Jul 2023 11:33 PM)</i>
634	El país importador podrá llevar a cabo actividades de seguimiento de las vías a fin de determinar la eficacia de las medidas fitosanitarias y realizar <u>auditorías evaluaciones</u> de los sistemas para verificar la aplicación de <u>las</u> medidas fitosanitarias.	P	<i>Category : TECHNICAL (552) OIRSA (27 Jul 2023 11:33 PM) en consistencia con el cuerpo de la norma</i>
643	ANEXO 4: Riesgos ambientales	C	<i>Category : TECHNICAL (1797) Costa Rica (30 Sep 2023 5:31)</i>

		AM) revisar términos de acuerdo a la NIMF 5
644	1. Introducción	C <i>Category : EDITORIAL</i> (1029) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Uruguay (23 ago 2023 8:51) Se sugiere revisar para evitar duplicación de texto, por ejemplo el primer párrafo repite información contenida en el texto central de la norma
665	los costos de la restauración del medio ambiente: <u>- el desplazamiento de controladores biológicos y fauna nativa.</u>	P <i>Category : TECHNICAL</i> (1651) Colombia (27 Sep 2023 11:08 PM) Incluir como ejemplo otra consecuencias indirectas de las plagas
665	los costos de la restauración del medio ambiente: <u>- el desplazamiento de controladores biológicos y fauna nativa.</u>	P <i>Category : TECHNICAL</i> (1030) IPPC Regional Workshop Latin America (18 Sep 2023 8:25 PM) Colombia (17 ago 2023 11:06) Se sugiere incluir como ejemplo otra consecuencias indirectas de las plagas

Compiled comments in French for 2023 First Consultation: 2020-001_Draft ISPM_PRA Summary

Participants

Name	Summary
Barbados	Barbados supports this revision.
European Union	The comments on the draft standard are submitted by the European Commission on behalf of the European Union and its 27 Member States.
Fiji Σ	Comments consolidated in PPPO review document at PPPO meeting in Cook Islands
Gabon	document validé
Malawi	We support the reorganization and revision of PRA standards
Nigeria	The processes outlined in this standard are sufficient enough to have a comprehensive PRA
Rania ElHayek	pest risk must include seeds on commodities, cause there is a risk that they may accidentally spread with seeds
Singapore	Singapore is supportive of this draft standard.

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

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

Para	Text	T	Comment
G	(General Comment)	C	<i>Category : TECHNICAL (1413) Sao Tomé and Principe (26 Sep 2023 10:21 PM)</i> je suis d'accord avec le texte en noir.
G	(General Comment)	C	<i>Category : TECHNICAL (1070) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i> Je suis d'accord avec la norme
G	(General Comment)	C	<i>Category : SUBSTANTIVE (608) Madagascar (5 Sep 2023 9:12 AM)</i> Definition de OVM à préciser.
56	Champ d'application	C	(311) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 9:50 PM] Black - Scope is from ISPM2 but most texts were updated
59	La présente norme ne couvre pas l'ARP pour les organismes réglementés non de quarantaine, pour lesquels des orientations sont fournies dans la NIMP 21 (Analyse	C	(312) Imported Comment (30 Jun 2023 6:33 PM)

	<i>du risque phytosanitaire pour les organismes réglementés non de quarantaine).</i>		[Originally made by M.Sai on 18 May 2023 9:51 PM] Black - new text.
72	CONTEXTE	C	(313) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 9:52 PM] Blue - Background is from ISPM2
79	<i>Les principes de nécessité, de gestion des risques, d'impact minimal, de transparence, d'harmonisation, de non-discrimination, de justification technique, de coopération et d'équivalence, tels que décrits dans la NIMP 1 (<i>Principes phytosanitaires pour la protection des végétaux et l'application de mesures phytosanitaires dans le cadre du commerce international</i>) et l'Accord de l'Organisation mondiale du commerce (OMC) sur l'application des mesures sanitaires et phytosanitaires (Accord SPS) (OMC, 1994), sont des éléments essentiels à prendre en compte dans l'analyse des risques liés aux organismes nuisibles.</i>	C	(314) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 9:57 PM] Black - This paragraph is new text
82	La norme fournit des indications sur la façon de déterminer si un organisme nuisible satisfait aux critères à remplir pour être considéré comme un organisme de quarantaine et sur les options de gestion du risque phytosanitaire qui permettent de gérer le risque phytosanitaire associé. La détermination de ces options tient compte du degré d'incertitude et les options définies sont proportionnelles au risque. Le processus comprend l'analyse des risques pour la biodiversité et l'environnement que posent les organismes nuisibles. Les mesures phytosanitaires qui en résultent peuvent contribuer à protéger l'environnement et à préserver la biodiversité par la gestion du risque phytosanitaire posé par les marchandises faisant l'objet de déplacements internationaux, les mesures phytosanitaires qui ne sont pas techniquement justifiées étant évitées.	C	(315) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 9:57 PM] Black - This paragraph is new text
86	Le processus d'ARP peut être utilisé pour des organismes n'ayant pas été précédemment reconnus comme étant nuisibles (tels que végétaux, agents de lutte biologique et autres organismes utiles, et OVM), pour des organismes nuisibles reconnus, pour des filières et pour l'examen de politiques phytosanitaires. <u>Le processus peut être résumé se résume</u> comme suit:	P	<i>Category : EDITORIAL</i> (586) Congo (30 Aug 2023 9:35 AM) "peut être résumé" ôte le caractère contraignant
86	<i>Le processus d'ARP peut être utilisé pour des organismes n'ayant pas été précédemment reconnus comme étant nuisibles (tels que végétaux, agents de lutte biologique et autres organismes utiles, et OVM), pour des organismes nuisibles reconnus, pour des filières et pour l'examen de politiques phytosanitaires. Le processus peut être résumé comme suit:</i>	C	(316) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:51 PM] Black - This paragraph from ISPM2 is revised

88	<p><u>-Le processus d'ARP commence à l'étape 1, qui -étape 1 (mise en route)</u> consiste à identifier l'organisme nuisible (ou les organismes nuisibles) et les filières qui peuvent susciter des préoccupations et qui devraient être prises en considération pour l'évaluation du risque phytosanitaire dans la zone ARP identifiée. Si aucun organisme nuisible n'est identifié à cette étape, l'analyse peut prendre fin.</p>	P	<p><i>Category : TECHNICAL (1062) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i> il s'agit de ressortir la désignation de cette étape comme celles qui suivent</p>
88	<p><u>Le processus d'ARP commence à l'étape 1, qui -L'étape 1 (Mise en route)</u> consiste à identifier l'organisme nuisible (ou les organismes nuisibles) et les filières qui peuvent susciter des préoccupations et qui devraient être prises en considération pour l'évaluation du risque phytosanitaire dans la zone ARP identifiée. Si aucun organisme nuisible n'est identifié à cette étape, l'analyse peut prendre fin.</p>	P	<p><i>Category : SUBSTANTIVE (587) Congo (30 Aug 2023 9:40 AM)</i></p>
91	<p><u>Cependant, l'ARP n'est pas forcément un processus linéaire, car il peut être nécessaire de revenir d'un stade à un autre au cours de l'analyse complète. La collecte d'informations, la documentation et la communication sur le risque phytosanitaire sont assurées tout au long du processus d'ARP.</u></p>	C	<p>(317) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:51 PM] Black - This paragraph from ISPM2 is revised</p>
93	<p><u>Les exigences générales relatives au processus d'ARP et les aspects communs à l'ensemble des étapes de l'ARP (par exemple la collecte d'informations, la documentation et la communication sur le risque phytosanitaire) sont fournies dans le corps de la présente norme et des informations détaillées sur chacune des étapes de l'APR sont données dans les annexes 1, 2 et 3, respectivement. Des informations détaillées sur les risques environnementaux, les OVM et les végétaux considérés comme des organismes nuisibles sont fournies dans les annexes 4, 5 et 6, respectivement.</u></p>	C	<p>(318) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:52 PM] Black - This paragraph from ISPM2 is revised</p>
95	<p><u>Une vue d'ensemble du processus d'ARP figure à l'appendice 1.</u></p>	C	<p>(319) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:52 PM] Black - This paragraph from ISPM2 is revised</p>
97	<p><u>Cette norme ne constitue pas un guide opérationnel ou méthodologique détaillé à l'intention des évaluateurs.</u></p>	C	<p>(320) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:52 PM] Black - This paragraph from ISPM2 is revised</p>
101	<p><u>Tout au long du processus, des informations devraient être recueillies et analysées scientifiquement possibles comme il convient afin de parvenir à des recommandations et des conclusions. Les publications scientifiques et des informations techniques, telles que des données de prospections et d'interceptions,</u></p>	P	<p><i>Category : SUBSTANTIVE (1063) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i> Ceci a besoin de résultats scientifiques avant son acceptation</p>

	peuvent être pertinentes. À mesure que l'analyse progresse, des lacunes dans l'information nécessitant de nouvelles enquêtes ou recherches peuvent être identifiées. Lorsque les informations sont insuffisantes ou ne sont pas concluantes, il est possible de faire appel à un jugement d'experts s'il y a lieu.		
101	Tout au long du processus, des informations devraient être recueillies et analysées comme il convient afin de parvenir à des recommandations et des conclusions. Les publications scientifiques et des informations techniques, telles que des données de prospections et d'interceptions, peuvent être pertinentes. À mesure que l'analyse progresse, des lacunes dans l'information nécessitant de nouvelles enquêtes ou recherches peuvent être identifiées. Lorsque les informations sont insuffisantes ou ne sont pas concluantes, il est possible de faire appel à un jugement d'experts s'il y a lieu.	C	(321) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:50 PM] Blue – this paragraph is from section3.2 of ISPM2
103	La coopération en matière de fourniture d'informations et la réponse aux demandes de renseignements présentées par l'intermédiaire du point de contact officiel sont des obligations au titre de la CIPV (articles VIII.1c et VIII.2). Les demandes d'informations adressées à d'autres parties contractantes devraient être aussi spécifiques que possible et limitées aux renseignements essentiels aux fins de l'analyse. Les informations utiles à l'analyse peuvent être demandées à d'autres institutions.	C	(322) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:51 PM] Blue – this paragraph is from section3.2 of ISPM2
106	L'incertitude fait partie du risque et il est donc important de la reconnaître et de la documenter au moment d'effectuer une ARP. Des sources d'incertitude dans le cadre d'une ARP peuvent être notamment: l'absence de données ou des données incomplètes, incohérentes ou contradictoires; la variabilité naturelle des systèmes biologiques; la subjectivité de l'analyse; et un échantillonnage aléatoire. Les symptômes dont les causes et l'origine sont incertaines et les vecteurs asymptomatiques d'organismes nuisibles peuvent être particulièrement problématiques.	C	(323) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:50 PM] Blue - the paragraph is from section3.1 of ISPM2
108	La nature et le degré de l'incertitude de l'analyse devraient être documentés et communiqués, et le recours à un jugement d'experts devrait être clairement indiqué. Si l'addition ou le renforcement de mesures phytosanitaires sont recommandés pour compenser l'incertitude, cela devrait être noté. La documentation de l'incertitude favorise la transparence et peut également être utile pour identifier les besoins ou les priorités en matière de recherche.	C	(324) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:50 PM] Blue - the paragraph is from section3.1 of ISPM2
110	L'incertitude étant inhérente à toute ARP, il convient de surveiller la situation	C	(325) Imported Comment (30 Jun 2023 6:33 PM)

	phytosanitaire résultant de la réglementation basée sur une ARP donnée et de procéder à une nouvelle évaluation des décisions précédentes.	[Originally made by M.Sai on 21 May 2023 5:50 PM] Blue - the paragraph is from section3.1 of ISPM2
113	Le principe de transparence suppose que les parties contractantes communiquent, sur demande, la justification technique des exigences phytosanitaires à l'importation. Ainsi, l'ARP devrait être suffisamment documentée, ce qui peut être assuré grâce à une documentation à deux niveaux:	C (326) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.3 of ISPM2
118	Chaque organisation nationale pour la protection des végétaux (ONPV) peut documenter les procédures et critères de son processus d'ARP général.	C (327) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.1 of ISPM2
121	Pour chaque analyse, l'ensemble du processus devrait être suffisamment documenté, depuis la mise en route jusqu'à la gestion du risque phytosanitaire, pour que les sources d'information et les raisons justifiant les décisions prises pour la gestion puissent être clairement établies. Il n'est pas nécessaire toutefois que l'ARP soit longue et complexe. Une ARP brève et concise peut être suffisante s'il est possible d'en tirer des conclusions valables après avoir terminé seulement un nombre limité d'étapes du processus d'ARP.	C (328) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.2 of ISPM2
123	La documentation à établir devrait concerner principalement les éléments suivants:	C (329) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.2 of ISPM2
138	Parmi les autres aspects à documenter, on peut citer:	C (330) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:49 PM] Blue – this paragraph is from section3.3.2 of ISPM2
144	La communication sur le risque phytosanitaire est importante tout au long de chaque étape de l'ARP. Elle est en général reconnue comme étant un processus interactif d'échange d'informations entre l'ONPV qui a mené l'ARP et les parties intéressées. Il ne s'agit ni d'un simple flux d'information à sens unique, ni de faire comprendre une situation de risque aux parties prenantes, mais elle vise plutôt à concilier le point de vue des scientifiques, des parties prenantes, des responsables politiques, et autres, pour:	C (331) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:47 PM] Blue – this paragraph is from section3.4 of ISPM2
150	Une fois l'ARP achevée, les preuves à l'appui de l'ARP, les mesures d'atténuation proposées et les incertitudes devraient être communiqués aux ONPV concernées et	C (332) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023

	peuvent être communiquées aux parties intéressées, y compris à d'autres parties contractantes, organisations régionales pour la protection des végétaux et ONPV, selon qu'il convient.		5:48 PM] Blue – this paragraph is from section3.4 of ISPM2
152	Si, à la suite de l'ARP, des exigences ou interdictions phytosanitaires à l'importation sont adoptées, la partie contractante publiera immédiatement ces mesures et les communiquera aux parties contractantes qui, à son avis, peuvent être directement concernées (en vertu des dispositions de l'article VII.2.b de la CIPV) et, sur demande, fournira les raisons justifiant de telles mesures à toute partie contractante (conformément à l'article VII.2.c de la CIPV).	C	(333) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.4 of ISPM2
154	Si, à la suite de l'ARP, des exigences ou interdictions phytosanitaires à l'importation ne sont pas adoptées, les parties contractantes peuvent diffuser cette information.	C	(334) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.4 of ISPM2
156	Les ONPV sont encouragées à communiquer les preuves de dangers autres que le risque phytosanitaire (tels que pour les animaux ou la santé humaine) aux autorités concernées.	C	(335) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:48 PM] Blue – this paragraph is from section3.4 of ISPM2
159	Les ONPV devraient s'efforcer d'assurer la cohérence dans la conduite de leurs ARP. La cohérence offre de nombreux avantages, notamment:	C	(336) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:46 PM] Blue – this paragraph is from section3.5 of ISPM2
165	La cohérence peut être assurée, par exemple, grâce à l'élaboration de critères généraux de décision et d'étapes de procédure, la formation des personnes effectuant les ARP, et l'examen des projets d'ARP.	C	(337) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:47 PM] Blue – this paragraph is from section3.5 of ISPM2
168	Lorsque d'autres parties contractantes sont directement concernées par le résultat d'une ARP particulière, l'ONPV qui effectue cette ARP devrait, sur demande, fournir des informations sur l'achèvement de celle-ci, indiquant si possible un calendrier prévisionnel, en tenant compte de la nécessité d'éviter les retards injustifiés (voir la NIMP 1).	C	(338) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:46 PM] Blue – this paragraph is from section1 of ISPM2
171	L'ensemble des organismes nuisibles couverts par la CIPV s'étend au-delà des organismes nuisibles qui s'attaquent directement aux plantes cultivées. Les organismes nuisibles peuvent également comprendre les organismes nuisibles qui s'attaquent indirectement aux plantes cultivées, les organismes nuisibles qui s'attaquent aux plantes non-cultivées, les OVM et les végétaux considérés comme	C	(339) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:11 PM] Black – this paragraph from ISPM11 is revised.

	des organismes nuisibles.		
174	<p>La CIPV s'applique à la protection des plantes sauvages et cultivées. Par conséquent, les organismes nuisibles qui s'attaquent, directement ou indirectement, à tous les types de plantes relèvent du champ d'application de la CIPV. L'annexe 4 fournit des informations sur le champ d'application de la CIPV en ce qui concerne les risques pour l'environnement.</p>	C	<p>(340) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:12 PM] Black – this paragraph from ISPM11 is revised.</p>
177	<p>La présente norme porte généralement sur les caractéristiques phénotypiques plutôt que sur les caractéristiques génotypiques. Cependant, il peut être nécessaire de tenir compte des caractéristiques génotypiques et la situation taxonomique lorsqu'on évalue le risque phytosanitaire que pose un OVM. L'annexe 5 fournit des informations sur le champ d'application de la CIPV en ce qui concerne l'ARP pour les OVM, ainsi que les facteurs à prendre en considération pour déterminer si un OVM peut être un organisme nuisible.</p>	P	<p><i>Category : SUBSTANTIVE (1064) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i> Parfois, Il y a certaine plante qui est déjà classée parmi des parasites dans leur classification taxonomique</p>
177	<p>La présente norme porte généralement sur les caractéristiques phénotypiques plutôt que sur les caractéristiques génotypiques. Cependant, il peut être nécessaire de tenir compte des caractéristiques génotypiques lorsqu'on évalue le risque phytosanitaire que pose un OVM. L'annexe 5 fournit des informations sur le champ d'application de la CIPV en ce qui concerne l'ARP pour les OVM, ainsi que les facteurs à prendre en considération pour déterminer si un OVM peut être un organisme nuisible.</p>	C	<p>(341) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:12 PM] Black – this paragraph from ISPM11 is revised.</p>
181	<p>L'intensification des échanges commerciaux et le développement de marchés axés sur de nouveaux végétaux s'accompagnent d'une augmentation du volume et de la diversité des végétaux acheminés d'un pays à l'autre et à l'intérieur des pays. Les déplacements des végétaux peuvent comporter deux types de risques phytosanitaires: le végétal peut, en tant que filière, porter des organismes nuisibles, ou le végétal lui-même peut être un organisme nuisible. L'introduction potentielle d'organismes nuisibles associés à des végétaux en tant que filière est un risque reconnu de longue date et faisant l'objet de nombreuses réglementations. Toutefois, le risque phytosanitaire posé par les végétaux considérés comme des organismes nuisibles nécessite un examen particulier. L'annexe 6 fournit des informations sur le champ d'application de la CIPV en ce qui concerne l'ARP pour les végétaux considérés comme des organismes nuisibles.</p>	C	<p>(342) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:13 PM] Black – this paragraph from ISPM11 is revised.</p>
190	<p>La mise en route de l'ARP a pour but d'identifier les organismes nuisibles et les filières susceptibles d'être considérés comme des organismes de quarantaine ou des</p>	C	<p>(343) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023</p>

	filières d'organismes de quarantaine, respectivement, dans la zone ARP identifiée.		10:17 PM] Black – this paragraph from section1 of ISPM2 is editorially revised.
192	Un processus d'ARP peut être déclenché dans les cas suivants:	C	(344) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
198	La mise en route comporte quatre opérations:	C	(345) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
204	Lorsque le processus d'ARP a été amorcé par une demande d'examen d'une filière, les étapes ci-dessus sont précédées par l'établissement d'une liste des organismes pouvant avoir une importance réglementaire, car ils sont susceptibles d'être associés à une filière.	C	(346) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
206	À ce stade, des informations sont nécessaires pour identifier l'organisme et son incidence économique potentielle, y compris l'impact sur l'environnement ² . D'autres données utiles sur l'organisme peuvent inclure sa répartition géographique, ses plantes hôtes, <u>son cycle de développement</u> ses habitats et son association avec des marchandises. Pour les filières, des informations concernant la marchandise, y compris les modes de transport et son usage prévu, sont essentielles.	P	<i>Category : SUBSTANTIVE</i> (1065) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM) La connaissance du cycle de développement d'un organisme pourra aider dans certaine décisions à prendre pour maîtriser ses impacts
206	À ce stade, des informations sont nécessaires pour identifier l'organisme et son incidence économique potentielle, y compris l'impact sur l'environnement ² . D'autres données utiles sur l'organisme peuvent inclure sa répartition géographique, ses plantes hôtes, ses habitats et son association avec des marchandises. Pour les filières, des informations concernant la marchandise, y compris les modes de transport et son usage prévu, sont essentielles.	C	(347) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:18 PM] Blue – this paragraph is from section1 of ISPM2
211	Une ARP nouvelle ou révisée pour une filière déterminée peut s'avérer nécessaire dans les cas suivants:	C	(348) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:26 PM] Blue – this paragraph is from section1 of ISPM2
218	Dans ces cas, la marchandise elle-même n'est pas un organisme nuisible. Lorsque la marchandise peut être un organisme nuisible, elle devrait aussi être analysée selon les indications de la section 2.4 de la présente annexe.	C	(349) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:26 PM] Blue – this paragraph is from section1 of ISPM2

220	<p>Une liste des organismes susceptibles d'être associés à la filière devrait être dressée, comprenant les organismes qui n'ont pas encore été clairement identifiés comme étant des organismes nuisibles. Lorsqu'une ARP est effectuée pour une marchandise dont le commerce existe déjà, les signalements d'interceptions d'organismes nuisibles devraient être utilisés comme base pour établir la liste des organismes nuisibles associés.</p>	C	<p>(350) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:26 PM] Blue – this paragraph is from section1 of ISPM2</p>
223	<p>Une ARP nouvelle ou révisée concernant un organisme nuisible spécifique reconnu peut s'avérer nécessaire dans les cas suivants:</p>	C	<p>(351) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:27 PM] Blue – blue colored texts are from ISPM2</p>
226	<p>une situation d'urgence découle de la découverte d'une infestation établie ou d'un foyer d'un nouvel organisme nuisible au sein d'une zone ARP (voir la NIMP 1);</p>	C	<p><i>Category : SUBSTANTIVE (1066) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM)</i> "voir la NIMP 11" au lieu de "NIMP 1"</p>
226	<p>une situation d'urgence découle de la découverte d'une infestation établie ou d'un foyer d'un nouvel organisme nuisible au sein d'une zone ARP (voir la NIMP 1);</p>	C	<p>(352) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:27 PM] Red – this text is from section 1.1.2 of ISPM11</p>
231	<p>un organisme nuisible est introduit dans une zone ARP;</p>	C	<p>(353) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Red – this text is from section 1.1.2 of ISPM11</p>
237	<p>un organisme est modifié génétiquement d'une manière qui met clairement en évidence son potentiel d'organisme nuisible (OVM)³.</p>	C	<p>(354) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Red – this text is from section 1.1.2 of ISPM11</p>
240	<p>Dans ces cas, le fait que l'organisme soit reconnu comme nuisible devrait être consigné en préparation de l'étape 2 de l'ARP.</p>	C	<p>(355) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Blue – this paragraph is from ISPM2</p>
243	<p>Une ARP nouvelle ou révisée peut s'avérer nécessaire dans les cas suivants:</p>	C	<p>(356) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:28 PM] Blue – blue colored texts are from section1.1.3 of ISPM2</p>
246	<p>une proposition émanant d'un autre pays ou d'une organisation internationale (par exemple, une organisation régionale pour la protection des végétaux ou</p>	C	<p>(357) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023</p>

	<p>l'Organisation des Nations Unies pour l'alimentation et l'agriculture) est examinée;</p>		5:28 PM] Red – this text is from section 1.1.3 of ISPM11
250	<p>des mesures phytosanitaires font naître un différend; ou</p>	C	(358) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Red – this text is from section 1.1.3 of ISPM11
252	<p>la situation phytosanitaire d'un pays change, un nouveau pays est créé, ou les frontières politiques sont déplacées.</p>	C	(359) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Red – this text is from section 1.1.3 of ISPM11
254	<p>Dans ces cas, les organismes nuisibles auront déjà été identifiés et ce fait devrait être consigné en préparation de l'étape 2 de l'ARP.</p>	C	(360) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Blue – this paragraph is from ISPM2
256	<p>Dans le cas d'un commerce existant, aucune mesure phytosanitaire nouvelle ne devrait être appliquée jusqu'à ce que l'ARP révisée ou nouvelle soit terminée, sauf si cela est rendu nécessaire par une situation phytosanitaire nouvelle ou inattendue pouvant nécessiter des mesures d'urgence.</p>	C	(361) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:29 PM] Blue – this paragraph is from ISPM2
259	<p>Un organisme peut faire l'objet d'une ARP dans les cas suivants:</p>	C	(362) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Blue – blue texts elements are from ISPM2
263	<p>une situation d'urgence découle de l'interception d'un nouvel organisme transporté par une marchandise importée;</p>	C	(363) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:43 PM] Red - this text is from section 1.1.2 of ISPM11
268	<p>Dans ces cas, il est nécessaire de déterminer si l'organisme est nuisible et est soumis à l'étape 2 de l'ARP. La section 3 de la présente annexe contient d'autres indications à ce sujet.</p>	C	(364) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Blue – this paragraph is from ISPM2
271	<p>Les points de départs font fréquemment référence aux «organismes nuisibles». La CIPV définit un organisme nuisible comme «toute espèce, souche ou biotype de végétal, d'animal ou d'agent pathogène nuisible aux végétaux ou produits végétaux». Lorsqu'on applique ces points de départ au cas spécifique des végétaux considérés comme organismes nuisibles, il est important de noter que les végétaux concernés devraient répondre à cette définition. Les organismes nuisibles qui</p>	C	(365) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Red – this paragraph is from S1 of section 1.1 of ISPM11

	s'attaquent directement aux végétaux répondent à cette définition. Par ailleurs, de nombreux organismes qui touchent les végétaux de manière indirecte (par exemple, les végétaux considérés comme des organismes nuisibles, comme les mauvaises herbes ou les plantes non autochtones) répondent également à cette définition. Le fait que ces organismes soient considérés comme nuisibles aux végétaux peut s'appuyer sur des preuves de leur impact obtenues dans une zone où ils sont présents. Dans le cas où il n'existe pas de preuves suffisantes indiquant qu'ils touchent indirectement les végétaux, une évaluation sur la base des informations pertinentes dont on dispose peut néanmoins être appropriée pour déterminer s'ils sont potentiellement nuisibles dans la zone ARP, en utilisant un système clairement documenté, transparent et appliqué de manière cohérente. Cela est particulièrement important pour les espèces végétales ou cultivars importés et destinés à la plantation.		
273	L'étape préliminaire consistant à déterminer si un organisme peut être nuisible est parfois appelée «pré-sélection» ou «examen initial».	C	(366) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:25 PM] Blue – this paragraph is from ISPM 2
275	L'identité taxonomique de l'organisme devrait être définie car les informations d'ordre biologique et autres utilisées dans l'évaluation devraient être pertinentes pour l'organisme en question. Si l'organisme n'a pas encore un nom ou une description complète, pour pouvoir le définir comme un organisme nuisible il devrait au moins avoir été établi qu'il peut être identifié, qu'il produit de manière régulière des dommages aux végétaux ou produits végétaux (par exemple, symptômes, ralentissement de la croissance, pertes de rendement ou autre dégât) et qu'il est transmissible ou est capable de dispersion.	C	(367) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2
277	Le niveau taxonomique des organismes faisant l'objet d'une ARP est généralement l'espèce. L'emploi d'un niveau taxonomique supérieur ou inférieur devrait être justifié scientifiquement. Dans le cas où des niveaux inférieurs à l'espèce sont utilisés, la justification devrait reposer sur des preuves d'une variation importante connue de facteurs tels que la virulence, la résistance aux pesticides, l'adaptabilité environnementale, la gamme de plantes hôtes ou son rôle de vecteur.	C	(368) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2
279	Les indicateurs prédictifs d'un organisme sont les caractéristiques qui, si elles ont présentes, indiquerait que l'organisme peut être nuisible. Les informations sur l'organisme devraient être vérifiées au regard de ces indicateurs. En leur absence, il peut être conclu que l'organisme n'est pas nuisible et l'analyse peut être arrêtée, les	C	(369) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2

	motifs d'une telle décision devant alors être consignés.		
281	Les indicateurs qui peuvent être examinés sont par exemple les suivants:	C	(370) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:24 PM] Blue – this paragraph is from ISPM 2
290	Les cas particuliers d'analyse concernent notamment les espèces végétales, les agents de lutte biologique ou autres organismes utiles (voir la NIMP 3 [<i>Directives pour l'exportation, l'expédition, l'importation et le lâcher d'agents de lutte biologique et autres organismes utiles</i>]), les organismes non encore dénommés ou décrits complètement ou difficiles à identifier, les organismes importés intentionnellement et les OVM. Le potentiel nuisible des végétaux devrait être déterminé selon les modalités décrites à l'annexe 6. Le potentiel nuisible des OVM devrait être déterminé selon les modalités décrites à l'annexe 5.	C	(371) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:23 PM] Blue – this paragraph is from ISPM 2
293	Les agents de lutte biologique et autres organismes utiles sont censés être utiles aux végétaux. Durant un processus d'ARP, la préoccupation première est donc un dommage potentiel à des organismes non visés ⁴ . D'autres sujets de préoccupation peuvent être notamment:	C	(372) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:45 PM] Blue – this paragraph is from ISPM 2
299	Des organismes qui n'ont pas encore été dénommés ou décrits complètement ou qui sont difficiles à identifier (par exemple, spécimens endommagés, stades de développement ne pouvant pas être identifiés) peuvent être détectés dans des envois importés ou au cours de la surveillance. Dans ces cas-là, il peut être nécessaire de décider si une action phytosanitaire est justifiée et s'il convient de recommander des mesures phytosanitaires. Celles-ci doivent se fonder sur une évaluation du risque phytosanitaire, à partir des informations disponibles, même si celles-ci sont très limitées. Il est recommandé, dans ce cas, de déposer des spécimens dans une collection de référence facilement accessible aux fins de futurs examens.	C	(373) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:45 PM] Blue – this paragraph is from ISPM 2
302	Dans le cas d'une demande d'importation, à des fins de recherche scientifique ou dans un but éducatif, industriel ou autre, d'un organisme pouvant être nuisible, l'identité de l'organisme en question devrait être clairement établie. Des informations concernant l'organisme ou des organismes étroitement apparentés peuvent être évaluées afin d'identifier des indicateurs montrant qu'il pourrait s'agir d'un organisme nuisible. Les organismes déterminés comme étant des organismes nuisibles peuvent faire l'objet d'une évaluation du risque phytosanitaire.	C	(374) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:23 PM] Blue – this paragraph is from ISPM 2

305	<p>La zone à laquelle l'ARP se rapporte doit être clairement définie. Il peut s'agir d'une partie ou de la totalité d'un ou de plusieurs pays. Bien qu'il soit possible de recueillir des informations sur une zone géographique plus vaste, l'analyse de l'établissement, de la dissémination et de l'incidence économique devrait se rapporter uniquement à la zone ARP définie.</p>	C	<p>(375) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:23 PM] Blue – this paragraph is from ISPM 2</p>
307	<p>À l'étape 2 du processus d'ARP, la zone menacée est identifiée. À l'étape 3, la zone réglementée indiquée peut toutefois être plus vaste que la zone menacée si cela est techniquement justifié et ne va pas à l'encontre du principe de non-discrimination.</p>	C	<p>(376) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:23 PM] Blue – this paragraph is from ISPM 2</p>
310	<p>La collecte d'informations est un élément essentiel à toutes les étapes de l'ARP. Elle devrait être effectuée au stade de la mise en route afin d'éclaircir l'identité de l'organisme nuisible (ou des organismes nuisibles), sa répartition actuelle et son association à des espèces végétales hôtes, des marchandises et autres. D'autres informations devraient être rassemblées si nécessaire pour la prise des décisions requises durant la suite de l'ARP.</p>	C	<p>(377) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:30 PM] Red – the paragraph is from section1.3 of ISPM11</p>
312	<p>Les informations utilisées pour l'ARP peuvent provenir de sources diverses. En vertu de la CIPV (article VIII.1c), les parties contractantes sont tenues de fournir, dans la mesure du possible, les informations officielles nécessaires à l'ARP, par l'intermédiaire des points de contact officiels (article VIII.2).</p>	C	<p>(378) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:31 PM] Red – the paragraph is from section1.3 of ISPM11</p>
315	<p>Avant de procéder à une nouvelle ARP, il convient de vérifier si l'organisme, l'organisme nuisible ou la filière a déjà fait l'objet d'une ARP. La validité des analyses existantes devrait être vérifiée car les circonstances et les données peuvent avoir changé. Leur pertinence au regard de la zone ARP devrait être confirmée.</p>	C	<p>(379) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:07 PM] Blue – this paragraph is from ISPM2</p>
317	<p>La possibilité d'utiliser l'ARP d'un organisme, d'un organisme nuisible ou d'une filière similaire peut également être envisagée, en particulier lorsque des informations sur l'organisme en question ne sont pas disponibles ou qu'elles sont incomplètes. Les données recueillies à d'autres fins, notamment lors d'évaluations de l'impact sur l'environnement de cet organisme ou d'un organisme étroitement apparenté, peuvent être utiles sans toutefois se substituer à une ARP.</p>	C	<p>(380) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:07 PM] Blue – this paragraph is from ISPM2</p>
320	<p>À la fin de l'étape 1 du processus, les organismes nuisibles et les filières visés auront été identifiés et la zone ARP définie. Des informations pertinentes auront été recueillies et les organismes nuisibles auront été identifiés en vue d'une éventuelle évaluation plus approfondie, soit individuellement soit en association avec une filière.</p>	C	<p>(381) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:04 PM] Blue – this paragraph is from ISPM2</p>

322	<p>In'est pas nécessaire de poursuivre l'évaluation des organismes dont il est établi qu'ils ne sont pas nuisibles ou des filières ne portant pas d'organismes nuisibles. La décision prise et ses raisons devraient être consignées et communiquées, comme il convient.</p>	C	<p>(382) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:05 PM] Blue – this paragraph is from ISPM2</p>
324	<p>Une fois établi qu'un organisme est nuisible, le processus peut être poursuivi à l'étape 2. Lorsqu'une liste d'organismes nuisibles a été dressée pour une filière donnée, les organismes nuisibles peuvent faire l'objet d'une évaluation collective (s'ils sont biologiquement similaires) ou individuelle.</p>	C	<p>(383) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:05 PM] Blue – this paragraph is from ISPM2</p>
326	<p>Lorsque l'ARP vise expressément à déterminer si l'organisme nuisible devrait être réglementé en tant qu'organisme de quarantaine, le processus peut passer directement à l'étape de la catégorisation des organismes nuisibles de l'ARP (étape 2), décrite à l'annexe 2 de la présente norme.</p>	C	<p>(384) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:05 PM] Blue – this paragraph is from ISPM2</p>
338	<p>Le processus d'évaluation du risque phytosanitaire se subdivise, en gros, en trois étapes interdépendantes:</p>	C	<p>(385) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:50 PM] Red – this paragraph is from section2 of ISPM11</p>
343	<p>La plupart du temps, ces étapes se succéderont durant l'ARP mais il n'est pas nécessaire de suivre un ordre particulier. L'évaluation du risque phytosanitaire ne doit pas être plus complexe que ne l'exigent les circonstances au point de vue technique.</p>	C	<p>(386) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:51 PM] Red – this paragraph is from section2 of ISPM11</p>
346	<p>Au départ, on ne distingue pas toujours clairement quel ou quels organismes nuisibles identifiés à l'étape 1 doivent faire l'objet d'une ARP. Le processus de catégorisation détermine, pour chaque organisme nuisible, si les critères de la définition d'un organisme de quarantaine sont remplis, c'est-à-dire si:</p>	C	<p>(387) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:08 PM] Red – this paragraph is from section2.1 of ISPM11</p>
348	<p>L'organisme n'est pas présent dans la zone ARP ou, s'il est présent, il a une répartition limitée et fait l'objet d'une lutte officielle ou une lutte officielle est envisagée;</p>	C	<p>(388) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:09 PM] Blue – three indents are from section1.5 of ISPM2</p>
352	<p>Dans l'évaluation d'une filière associée à une marchandise, plusieurs ARP individuelles peuvent être nécessaires pour les divers organismes nuisibles potentiellement associés à cette filière. Le fait de ne pas tenir compte d'un ou plusieurs organismes avant leur examen approfondi constitue une caractéristique utile du processus de catégorisation.</p>	C	<p>(389) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:09 PM] Red – this paragraph is from section2.1 of ISPM11</p>
354	<p>L'un des avantages de la catégorisation des organismes nuisibles est qu'elle peut</p>	C	<p>(390) Imported Comment (30 Jun 2023 6:33 PM)</p>

	être effectuée avec relativement peu d'informations, mais celles-ci seront toutefois suffisantes pour que la catégorisation soit effectuée correctement.	[Originally made by M.Sai on 21 May 2023 4:09 PM] Red - this paragraph is from section2.1 of ISPM11
357	Les critères de la catégorisation d'un organisme nuisible comme organisme de quarantaine comprend les principaux éléments suivants:	C (391) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:56 PM] Red - this paragraph is from section2.1.1 of ISPM11
365	L'identité de l'organisme nuisible sera définie clairement pour garantir que l'évaluation est bien effectuée sur un organisme distinct, et que les informations d'ordre biologique et autres utilisées dans l'évaluation sont pertinentes pour l'organisme en question. Si ce n'est pas possible car l'agent étiologique des symptômes particuliers n'a pas encore été totalement identifié, il faut alors pouvoir démontrer que l'organisme produit des symptômes uniformes et qu'il est transmissible ou capable de dispersion.	C (392) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:12 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
367	L'unité taxonomique de l'organisme nuisible est généralement l'espèce. L'emploi d'un niveau taxonomique supérieur ou inférieur devrait être justifié scientifiquement. Dans le cas où des niveaux inférieurs à l'espèce sont utilisés, la justification devrait reposer sur des preuves démontrant que des facteurs comme les différences concernant la virulence, la résistance aux pesticides, l'adaptabilité environnementale, la gamme de plantes hôtes ou les relations avec les vecteurs sont suffisamment significatifs pour influer sur le risque phytosanitaire.	C (393) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:58 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
369	Lorsqu'un vecteur est en cause, ce dernier peut aussi être considéré comme un organisme nuisible dans la mesure où il est associé à l'organisme étiologique et où il est nécessaire pour la transmission de l'organisme nuisible.	C (394) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 10:59 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
371	Les annexes 5 et 6 contiennent des indications spécifiques sur la prise en compte de l'OVM et de l'identité des végétaux considérés comme des organismes nuisibles.	C (395) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:23 PM] Red - this paragraph is from section2.1.1.1 of ISPM11
374	L'organisme nuisible sera absent de la totalité ou d'une partie donnée de la zone ARP.	C (396) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:01 PM] Red - this paragraph is from section2.1.1.2 of ISPM11
376	L'annexe 6 contient des indications spécifiques sur la détermination de la présence ou de l'absence de végétaux considérés comme des organismes nuisibles.	C (397) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023

			11:01 PM] Red - this paragraph is from section2.1.1.2 of ISPM11
379	Un organisme nuisible peut être réglementé s'il est présent mais n'est pas largement disséminé dans la zone ARP. Cependant, il fera l'objet d'une lutte officielle ou il doit être prévu de l'y assujettir dans un proche avenir.	C	(398) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:02 PM] Red - this text is from section2.1.1.3 of ISPM11. It is editorially revised.
382	Des données pertinentes devraient indiquer que l'organisme nuisible pourrait s'établir ou se disséminer dans la zone ARP. Celle-ci (qui comprend également les environnements protégés comme les serres) devrait présenter des conditions écologiques et climatiques propices à l'établissement et à la dissémination de l'organisme nuisible. Selon le cas, des espèces hôtes (ou proches), des hôtes alternes et des vecteurs devraient être présents dans la zone ARP.	C	(399) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:02 PM] Red - this paragraph is from section2.1.1.4 of ISPM11
384	2.1.5 Possibilités de conséquences dans la zone ARP	C	(400) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:52 PM] Red – The section title is revised from section 2.1.1.5 of ISPM11 Changed from “economic consequences” to “consequences”
387	Il devrait y avoir des signes indiquant clairement que l'organisme nuisible est susceptible d'avoir une incidence inacceptable dans la zone ARP.	C	(401) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:24 PM] Red - this paragraph is from section2.1.1.5 of ISPM11
389	L'incidence économique inacceptable est décrite dans le supplément 2 (<i>Directives pour la compréhension de l'expression importance économique potentielle et d'autres termes apparentés, compte tenu notamment de considérations environnementales</i>) à la NIMP 5.	C	(402) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:24 PM] Red - this paragraph is from section2.1.1.5 of ISPM11
392	Si l'on a pu déterminer que l'organisme nuisible est potentiellement un organisme de quarantaine, le processus d'ARP devrait continuer. Si l'organisme nuisible ne remplit pas tous les critères d'un organisme de quarantaine, le processus d'ARP peut s'arrêter. En l'absence d'informations suffisantes, les incertitudes devraient être identifiées et le processus d'ARP devrait se poursuivre.	C	(403) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:24 PM] Red - this paragraph is from section2.1.2 of ISPM11
395	L'introduction d'un organisme nuisible comprend son entrée et son établissement. Pour évaluer la probabilité d'introduction, une analyse de chacune des filières auxquelles un organisme nuisible peut être associé depuis son origine jusqu'à son établissement dans la zone ARP devrait être effectuée. Dans une ARP amorcée par	C	(404) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:19 PM] Red - the paragraph is from section2. 2 of ISPM11

	<p>une filière déterminée (généralement une marchandise importée), la probabilité d'entrée de l'organisme nuisible devrait être évaluée pour la filière en question. Les probabilités d'entrée de l'organisme nuisible associées à d'autres filières devraient être prises en compte également.</p>		
397	<p>Pour les ARP entreprises pour un organisme nuisible déterminé, sans envisager une marchandise ou une filière particulières, les possibilités de toutes les filières probables devraient être examinées.</p>	C	<p>(405) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:19 PM] Red - the paragraph is from section2. 2 of ISPM11</p>
399	<p>L'évaluation de la probabilité de dissémination devrait reposer essentiellement sur des considérations biologiques analogues à celles de l'entrée et de l'établissement.</p>	C	<p>(406) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:19 PM] Red - the paragraph is from section2. 2 of ISPM11</p>
401	<p>3.1 Probabilité d'entrée d'un organisme nuisible</p>	C	<p>(407) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:25 PM] Red - the paragraphs in section3.1 is from section2.2.1 of ISPM11</p>
407	<p>Toutes les filières pertinentes devraient être examinées. Elles peuvent être identifiées principalement par rapport à la répartition géographique et à la gamme de plantes hôtes de l'organisme nuisible. Les envois de végétaux et de produits végétaux faisant l'objet d'un commerce international sont les principales filières concernées et la structure actuelle de ces échanges déterminera, en grande partie, les filières pertinentes. Les autres filières, comme d'autres types de marchandises, les matériaux d'emballage, les personnes, les bagages, le courrier, les moyens de transport et les échanges de matériel scientifique, devraient être prises en considération, le cas échéant. L'entrée par des moyens naturels devrait également être examinée, car la dissémination naturelle est susceptible de rendre les mesures phytosanitaires moins efficaces.</p>	C	<p>(408) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:06 PM] Red - this paragraph is from section2.2.1.1 of ISPM11</p>
410	<p>La probabilité que l'organisme nuisible soit associé, dans l'espace ou le temps, à la filière à l'origine devrait être déterminée. Les facteurs qui devraient être pris en considération sont les suivants:</p>	C	<p>(409) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:06 PM] Red - this paragraph is from section2.2.1.2 of ISPM11</p>
418	<p>Les facteurs qui peuvent être pris en considération sont par exemple les suivants:</p>	C	<p>(410) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:07 PM] Red - this paragraph is from section2.2.1.3 of ISPM11</p>

425	<p>Les procédures de lutte en vigueur (y compris les procédures phytosanitaires) appliquées aux envois, contre d'autres organismes nuisibles de l'origine jusqu'à l'utilisation finale, devraient être évaluées du point de vue de leur efficacité contre l'organisme nuisible en question. La probabilité que l'organisme nuisible ne soit pas détecté durant l'inspection ou survive à d'autres procédures phytosanitaires existantes devrait être évaluée.</p>	C	<p>(411) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:07 PM] Red - this paragraph is from section2.2.1.4 of ISPM11</p>
428	<p>Pour estimer la probabilité d'établissement d'un organisme nuisible, des informations biologiques fiables (cycle biologique, gamme de plantes hôtes, épidémiologie, survie, etc.) devraient être recueillies dans les zones où l'organisme nuisible est alors présent. La situation de la zone ARP peut alors être comparée avec celle des zones où l'organisme nuisible est alors présent (en tenant compte également des environnements protégés, comme les serres) en ayant recours au jugement d'experts pour évaluer la probabilité d'établissement. On peut examiner avec profit d'autres études concernant des organismes nuisibles comparables. Les facteurs qui peuvent être pris en considération sont par exemple les suivants:</p>	C	<p>(412) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:08 PM] Red - this paragraph is from section2.2.2 of ISPM11</p>
430	<p>présence, quantité et répartition des hôtes dans la zone ARP;</p>	C	<p>(413) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:08 PM] Black – these factors from section2.2.2 of ISPM11 are revised (i.e., 2 factors are deleted from originally 6 factors)</p>
435	<p>D'autres caractéristiques de l'organisme nuisible peuvent également influer sur la probabilité d'établissement. Lors de l'examen de la probabilité d'établissement, on devrait noter qu'un organisme nuisible dont la situation est «présence: à titre transitoire» (voir la NIMP 8 [Détermination de la situation d'un organisme nuisible dans une zone]) peut ne pas être en mesure de s'établir dans la zone ARP (en raison, par exemple, de conditions climatiques contraires) mais pourrait néanmoins avoir des conséquences économiques inacceptables (voir la CIPV, article VII.3).</p>	C	<p>(414) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:10 PM] Red - this paragraph is from section2.2.2 of ISPM11</p>
437	<p>L'annexe 6 contient des indications spécifiques sur l'évaluation de la probabilité d'établissement des végétaux considérés comme des organismes nuisibles.</p>	C	<p>(415) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:11 PM] Red - this paragraph is from section2.2.2 of ISPM11</p>
440	<p>Les facteurs qui devraient être pris en considération sont les suivants:</p>	C	<p>(416) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:11 PM] Red - this paragraph is from</p>

		section2.2.2.1 of ISPM11
447	<p>Le niveau taxonomique auquel les hôtes sont examinés devrait normalement être l'espèce. L'emploi d'un niveau taxonomique supérieur ou inférieur devrait être justifié scientifiquement.</p>	C (417) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:11 PM] Red - this paragraph is from section2.2.2.1 of ISPM11
449	3.2.2 Probabilité de transfert à un hôte approprié	C (418) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:12 PM] Red - "Probability of transfer to a suitable host" is moved to under "Probability of establishment" from "Probability of entry of a pest" but the texts are not revised
460	<p>On devrait identifier les facteurs de l'environnement (climat, sol, concurrence organisme nuisible/hôtes) qui sont déterminants pour le développement de l'organisme nuisible, de son hôte et, le cas échéant, de son vecteur, et pour leur aptitude à survivre à des périodes de contraintes climatiques et à achever leur cycle biologique. Il est à noter que l'environnement a probablement différents effets sur l'organisme nuisible, son hôte et son vecteur. On en tiendra compte pour déterminer si l'interaction entre ces organismes dans la zone d'origine est conservée dans la zone ARP à l'avantage ou au détriment de l'organisme nuisible. On devrait prendre aussi en considération la probabilité d'établissement dans un environnement protégé, comme des serres.</p>	C (419) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2.2 of ISPM11
462	<p>Des systèmes de modélisation climatique peuvent être utilisés pour comparer les données climatiques de la zone de répartition connue d'un organisme nuisible avec celles de la zone ARP.</p>	C (420) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2.2 of ISPM11
465	<p>Le cas échéant, on devrait comparer les pratiques utilisées lors de la production (y compris la culture) des plantes cultivées hôtes afin de déterminer s'il existe des différences entre la zone ARP et la zone d'origine de l'organisme nuisible qui pourraient influer sur son aptitude à s'établir.</p>	C (421) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2.3 of ISPM11
467	<p>On peut examiner les programmes de lutte ou les ennemis naturels de l'organisme nuisible qui existent déjà dans la zone ARP et réduisent la probabilité de son établissement. Les organismes nuisibles pour lesquels la lutte n'est pas faisable devraient être considérés comme présentant un risque phytosanitaire plus élevé que ceux pour lesquels il est aisément d'effectuer un traitement. On devrait examiner également la présence (ou l'absence) de méthodes appropriées d'éradication.</p>	C (422) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:15 PM] Red - this paragraph is from section2.2.2.3 of ISPM11

470	<p>Les autres caractéristiques de l'organisme nuisible influant sur la probabilité d'établissement sont notamment les suivantes:</p>	C	(423) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:16 PM] Red - this paragraph is from section2.2.2.4 of ISPM11
476	<p>Un organisme nuisible ayant un fort potentiel de dissémination peut aussi avoir un fort potentiel d'établissement et les possibilités de parvenir à l'enrayer ou à l'éradiquer sont plus limitées. Pour estimer la probabilité de dissémination de l'organisme nuisible, on devrait recueillir des informations biologiques fiables sur des zones dans lesquelles celui-ci est alors présent. La situation de la zone ARP peut alors être soigneusement comparée avec celle des zones où l'organisme nuisible est alors présent (en tenant compte également des environnements protégés, par exemple les serres) et on peut avoir recours au jugement d'experts pour évaluer la probabilité de dissémination. On peut examiner avec profit d'autres études concernant des organismes nuisibles comparables. Les facteurs qui peuvent être pris en considération sont par exemple les suivants:</p>	C	(424) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:16 PM] Red - this paragraph is from section2.2.3 of ISPM11
484	<p>L'annexe 6 contient des indications spécifiques sur l'évaluation de la probabilité de dissémination des végétaux considérés comme des organismes nuisibles.</p>	C	(425) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:16 PM] Red - this paragraph is from section2.2.3 of ISPM11
486	<p>Les données concernant la probabilité de dissémination servent à estimer la rapidité avec laquelle l'importance économique potentielle de l'organisme nuisible peut se concrétiser dans la zone ARP. Cela est important également si l'organisme nuisible est susceptible d'entrer et de s'établir dans une zone où il peut potentiellement avoir une faible importance économique, puis de se disséminer dans une zone où il peut potentiellement avoir une forte importance économique. De plus, cette information peut être importante au stade de la gestion du risque lorsqu'on examine la faisabilité de l'enrayement ou de l'éradication d'un organisme nuisible introduit.</p>	C	(426) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from section2.2.3 of ISPM11
488	<p>Certains organismes nuisibles peuvent ne pas avoir d'effet nuisible sur les végétaux immédiatement après s'être établis et, en particulier, ils peuvent ne se disséminer qu'au bout d'un certain temps. L'évaluation de la probabilité de dissémination devrait en tenir compte sur la base de preuves d'un tel comportement.</p>	C	(427) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from section2.2.3 of ISPM11
491	<p>La probabilité générale d'introduction et de dissémination devrait être exprimée de la manière qui convient le mieux aux données, aux méthodes utilisées pour l'analyse, et aux destinataires visés. Il peut s'agir de données quantitatives ou qualitatives, car le résultat général est quoi qu'il en soit l'association</p>	C	(428) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from section2.2.4 of ISPM11

	d'informations quantitatives et qualitatives. La probabilité d'introduction et de dissémination peut être exprimée sous forme de comparaison avec les résultats d'ARP effectuées pour d'autres organismes nuisibles.		
493	On devrait identifier la partie de la zone ARP dans laquelle les facteurs écologiques favorisent l'établissement de l'organisme nuisible, dans le cadre de la détermination de la zone menacée. Il peut s'agir de tout ou partie de la zone ARP.	C	(429) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:17 PM] Red - this paragraph is from section2.2.4.1 of ISPM11
496	Dans le cadre de l'ARP, on ne devrait pas interpréter les conséquences comme étant limitées aux seuls effets économiques sur les marchés. Les biens et services qui ne font pas l'objet d'échanges commerciaux peuvent avoir une valeur économique et l'analyse économique dépasse largement l'étude des biens et services commerciaux. L'utilisation du terme «effets économiques» offre un cadre pour l'analyse d'un large éventail d'effets (y compris environnementaux et sociaux). L'analyse économique se sert de valeurs monétaires pour permettre aux décideurs de comparer les coûts et avantages de différents types de biens et services, sans exclure pour autant le recours à d'autres outils, tels que les analyses qualitatives et environnementales, qui n'utilisent pas forcément des termes monétaires. L'incidence économique est décrite dans le supplément 2 à la NIMP 5.	C	(430) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:19 PM] Black – new text
498	4.1 Conséquences	C	(431) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 4:38 PM] Red – the section title is from section2.3 of ISPM11. Changed "Assessment of potential economic consequences" to "Consequences"
500	Les prescriptions pour cette étape indiquent les informations qu'il faudrait recueillir sur l'organisme nuisible et ses plantes hôtes potentielles et proposent des niveaux des analyses économiques qui peuvent être effectuées au moyen de ces informations pour évaluer tous les effets de l'organisme nuisible (à savoir les conséquences économiques potentielles). Le cas échéant, on devrait rassembler des données quantitatives fournissant des valeurs monétaires. Des données qualitatives peuvent également être employées. Il peut être utile de consulter un économiste.	C	(432) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:20 PM] Red – the paragraph is from section2.3 of ISPM11
502	Bien souvent, l'analyse détaillée des conséquences économiques estimatives n'est pas nécessaire, si l'on dispose de preuves suffisantes ou s'il est généralement reconnu que l'introduction d'un organisme nuisible aura des conséquences économiques inacceptables (y compris l'impact sur l'environnement). Dans ce cas,	C	(433) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3 of ISPM11

	<p>l'évaluation du risque phytosanitaire peut porter essentiellement sur la probabilité d'introduction et de dissémination. Les facteurs économiques devraient, cependant, être examinés plus en détail lorsque le niveau de conséquences économiques est en cause, ou que le niveau de conséquences économiques doit être connu pour pouvoir évaluer la sévérité des mesures utilisées pour la gestion du risque phytosanitaire ou pour l'évaluation du rapport coûts-avantages de l'exclusion ou de la lutte.</p>		
504	<p>L'annexe 6 contient des indications spécifiques sur l'évaluation des conséquences économiques potentielles des végétaux considérés comme des organismes nuisibles.</p>	C	<p>(434) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3 of ISPM11</p>
507	<p>Pour estimer l'importance économique potentielle de l'organisme nuisible, des informations devraient être recueillies sur des zones où celui-ci est naturellement présent ou a été introduit. Ces informations devraient être comparées avec celles concernant la situation dans la zone ARP. On peut examiner avec profit d'autres études concernant des organismes nuisibles comparables. Les effets examinés peuvent être directs ou indirects.</p>	C	<p>(435) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3.1 of ISPM11</p>
509	<p>La méthode de base utilisée pour estimer l'importance économique potentielle des organismes nuisibles décrite dans cette section s'applique également:</p>	C	<p>(436) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:21 PM] Red – the paragraph is from section2.3.1 of ISPM11</p>
514	<p>Les effets et conséquences sur l'environnement considérés devraient être ceux résultant des effets des organisme nuisible sur les végétaux. Cependant, les effets sur les végétaux peuvent être moins importants que les effets ou conséquences sur d'autres organismes ou systèmes. Par exemple, un végétal considéré comme un organisme nuisible qui n'a qu'une incidence mineure sur les autres végétaux peut être un allergène puissant pour l'homme, ou un pathogène mineur des végétaux peut produire des toxines touchant sérieusement le bétail. Cependant, la réglementation de végétaux seulement sur la base de leurs effets sur d'autres organismes ou systèmes (par exemple sur la santé humaine ou animale) sort du champ d'application de cette norme. Si l'ARP met en évidence un danger potentiel pour d'autres organismes ou systèmes, cette information devrait être communiquée aux autorités compétentes ayant la responsabilité légale du problème.</p>	C	<p>(437) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:22 PM] Red – the paragraph is from section2.3.1 of ISPM11</p>
517	<p>Pour identifier et caractériser les effets directs de l'organisme nuisible sur chaque hôte potentiel dans la zone ARP, ou les effets qui sont spécifiques à l'hôte, on peut tenir compte des facteurs ci-après:</p>	C	<p>(438) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:22 PM] Red – the paragraph is from</p>

			section2.3.1.1 of ISPM11
529	Pour chaque hôte potentiel, la superficie totale des cultures et la zone potentiellement menacée devraient être évaluées en fonction des éléments ci-dessus.	C	(439) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:22 PM] Red – the paragraph is from section2.3.1.1 of ISPM11
532	Pour l'identification et la caractérisation des effets indirects de l'organisme nuisible dans la zone ARP, ou des effets non spécifiques à l'hôte, les facteurs ci-après peuvent être pris en compte:	C	(440) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:23 PM] Red – the paragraph is from section2.3.1.2 of ISPM11
542	Lors de l'examen des effets sur les marchés intérieur et d'exportation, les conséquences potentielles sur l'accès au marché pouvant résulter de l'établissement éventuel de l'organisme nuisible devraient être estimées. Cela suppose une prise en compte de la portée de toute réglementation phytosanitaire imposée (ou ayant des probabilités d'être imposée) par les pays importateurs.	C	(441) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:25 PM] Red – the paragraph is from ISPM11 (from bracket of 1st indent of section 2.3.1.2)
544	Les effets sur la santé humaine et animale (par exemple, toxicité ou allergénicité), les nappes phréatiques et le tourisme, entre autres, peuvent également être pris en considération, selon les cas, par d'autres agences ou autorités compétentes.	C	(442) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:27 PM] Red – the paragraph is from section2.3.1.2 of ISPM11
547	Certains effets directs et indirects d'un organisme nuisible visés aux sections 4.1.2 et 4.1.3 seront de nature économique, ou porteront sur certains types de valeur, mais ne concerneront pas un marché existant facilement identifiable. Par conséquent, ces effets peuvent ne pas être mesurés correctement, sous forme de prix sur des marchés de services ou de produits établis. Ce sont par exemple certains effets particuliers sur l'environnement (tels que stabilité de l'écosystème, biodiversité) et les effets sociaux (tels que bien-être mental ou connexions spirituelles, religieuses et culturelles) résultant de l'introduction d'un organisme nuisible. Ces effets peuvent être déterminés de façon approximative par une méthode appropriée d'évaluation ne portant pas sur les marchés. Des détails supplémentaires sur les effets sur l'environnement sont donnés plus bas.	C	(443) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:28 PM] Red – the paragraph is from section2.3.2.4 of ISPM11
549	S'il n'est pas possible de mesurer quantitativement ces effets, on peut fournir des informations qualitatives. En outre, on devrait toujours donner une explication de la manière dont ces informations ont été incorporées dans les décisions.	C	(444) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:28 PM] Red – the paragraph is from section2.3.2.4 of ISPM11
553	Les estimations effectuées dans la section précédente pourraient concerner une situation hypothétique où l'organisme nuisible est censé avoir été introduit et	C	(445) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023

	<p>exprimer pleinement ses conséquences économiques potentielles (par an) dans la zone ARP. Toutefois, dans la pratique, les conséquences économiques s'expriment dans la durée et peuvent concerner une année, plusieurs années ou une période indéterminée. Plusieurs scénarios devraient être examinés. Les conséquences économiques totales sur plus d'une année peuvent être exprimées comme la valeur actuelle nette des conséquences économiques annuelles, et un taux d'actualisation approprié est choisi pour calculer la valeur actuelle nette.</p>		11:29 PM] Red – the paragraph is from section2.3.2.1 of ISPM11
555	<p>On peut établir d'autres scénarios selon que l'organisme nuisible est présent à un, plusieurs ou de nombreux endroits dans la zone ARP et l'expression des conséquences économiques potentielles dépendra du taux et des moyens de dissémination dans la zone ARP. La vitesse de dissémination envisagée pourra être faible ou forte; dans certains cas, on peut supposer que la dissémination peut être évitée. Une analyse appropriée peut être menée pour estimer les conséquences économiques potentielles pour la période pendant laquelle un organisme nuisible est disséminé dans la zone ARP. Par ailleurs, beaucoup de facteurs ou d'effets indiqués ci-dessus pourraient évoluer au fil du temps, ce qui modifierait les conséquences économiques potentielles. Il est possible de recourir à un jugement d'experts et à des estimations s'il y a lieu.</p>	C	(446) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.3.2.1 of ISPM11
558	<p>Comme indiqué ci-dessus, la plupart des effets directs d'un organisme nuisible, et certains des effets indirects, seront de nature commerciale ou auront des conséquences pour un marché donné. Ces effets, qui peuvent être positifs ou négatifs, devraient être identifiés et quantifiés, dans la mesure du possible. Il peut être utile de prendre en considération les effets suivants:</p>	C	(447) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.2.2 of ISPM11
563	<p>Il existe des techniques analytiques pouvant être utilisées, en consultation avec des experts en économie, pour mener une étude plus détaillée des effets économiques potentiels d'un organisme de quarantaine. Tous les effets identifiés devraient être incorporés dans l'analyse. Les techniques peuvent, par exemple, être les suivantes:</p>	C	(448) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.3.2.3 of ISPM11
568	<p>L'utilisation des techniques analytiques est souvent compliquée par les incertitudes relatives aux données et par le fait que certains effets ne s'expriment que par des données qualitatives.</p>	C	(449) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:29 PM] Red – the paragraph is from section2.3.2.3 of ISPM11
571	<p>L'application de la présente norme aux conséquences pour l'environnement nécessite une catégorisation claire des valeurs environnementales et des méthodes utilisées pour les évaluer. Diverses méthodes peuvent être utilisées pour attribuer une valeur à l'environnement, mais il est préférable de les utiliser en consultation</p>	C	(450) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:31 PM] Red – the paragraph is from section2.3.2.4 of ISPM11

	avec des économistes. Ces méthodes peuvent inclure l'examen des valeurs «d'usage» ou de «non usage». Les valeurs «d'usage» se rapportent à la consommation d'un élément de l'environnement, comme l'accès à de l'eau potable ou la pêche dans un lac, mais incluent également des valeurs qui ne concernent pas la consommation, comme l'utilisation des forêts aux fins d'activités de loisir. Les valeurs de «non usage» peuvent être subdivisées en:		
576	Que l'élément de l'environnement soit évalué en termes de valeurs d'usage ou de non usage, il existe des méthodes permettant de déterminer celles-ci, tels que des approches basées sur les marchés, les marchés de substitution, les marchés simulés et les transferts de bénéfices. Chacune de ces méthodes a des avantages, des désavantages et des situations dans lesquelles elle est particulièrement utile.	C	(451) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:33 PM] Red – the paragraph is from section2.3.2.4 of ISPM11
578	L'évaluation des conséquences peut être quantitative ou qualitatives, et les données qualitatives suffisent dans de nombreux cas. Il peut ne pas exister de méthode quantitative pour évaluer une situation donnée (par exemple, effets catastrophiques sur une espèce clé), ou l'analyse quantitative peut ne pas être possible (aucune méthode disponible). Des analyses utiles peuvent se baser sur des estimations non monétaires (nombre d'espèces affectées, qualité de l'eau) ou sur un jugement d'experts, à condition que ces analyses suivent des procédures documentées, cohérentes et transparentes.	C	(452) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:33 PM] Red – the paragraph is from section2.3.2.4 of ISPM11
581	Dans les cas qui le permettent, le résultat de l'évaluation des conséquences décrites ici devrait être exprimé en valeur monétaire. Ces conséquences peuvent également être exprimées qualitativement ou au moyen de mesures quantitatives non monétaires. Les sources d'information, les hypothèses, l'incertitude et les méthodes d'analyse employées devraient être clairement indiquées.	C	(453) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:34 PM] Red – the paragraph is from section2.3.3 of ISPM11 Changed "economic consequences" to "consequences"
585	La partie de la zone ARP où la présence de l'organisme nuisible entraînera des pertes importantes sur le plan économique devrait être identifiée.	C	(454) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 7:49 PM] Red – the paragraph is from section2.3.3.1 of ISPM11 Deleted "This is needed to define the endangered area." from "2.3.3.1 Endangered area" of the present ISPM11
589	L'estimation de la probabilité d'introduction de l'organisme nuisible et de ses conséquences comporte de nombreuses incertitudes. En particulier, cette estimation est une extrapolation de la situation dans laquelle l'organisme nuisible est réellement présent, à une situation hypothétique dans la zone ARP. Les zones et le	C	(455) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 7:46 PM] Red – the paragraph is from section2.4 of ISPM11

	degré de l'incertitude de l'évaluation devraient être documentés, de même que le recours à un jugement d'experts. Cela est important pour des raisons de transparence et peut être utile aussi pour identifier les besoins de recherche et les classer par ordre de priorité.		Changed "economic consequences" to "consequences"
593	À l'issue de l'évaluation du risque phytosanitaire, les organismes nuisibles classés peuvent être considérés, tous ou quelques-uns, comme appropriés pour la gestion du risque phytosanitaire. Pour chaque organisme nuisible, tout ou partie de la zone ARP peut avoir été classé comme zone menacée. Une estimation quantitative ou qualitative de la probabilité d'introduction et de dissémination d'un ou plusieurs organismes nuisibles et une estimation quantitative ou qualitative correspondante des conséquences ont été obtenues et documentées et une estimation moyenne a été faite. Ces estimations, et les incertitudes connexes, serviront de données pour l'étape de gestion du risque phytosanitaire de l'ARP.	C	(456) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 7:38 PM] Red – the paragraph is from section2.5 of ISPM11 Changed "economic consequences (including environmental consequences)" to "consequences"
602	ANNEXE 3: Gestion du risque phytosanitaire (étape 3 de l'ARP)	C	(457) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 19 May 2023 12:08 AM] Black – Most texts in Annex-3 are from ISPM on PRA or revised texts from ISPM11. Red – some paragraphs are from ISPM11 see comments below
632	<i>Équivalence.</i> Si différentes mesures phytosanitaires ayant le même niveau de protection sont identifiées, elles devront être acceptées en tant qu'autres mesures possibles.	C	(458) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 6:01 PM] Red – the text is from ISPM11
634	<i>Non-discrimination.</i> Si l'organisme nuisible en cause est établi dans la zone ARP mais qu'il n'est pas largement disséminé et qu'il fait l'objet d'une lutte officielle, les mesures phytosanitaires relatives aux importations ne seront pas plus restrictives que celles qui sont appliquées dans la zone ARP. De même, les mesures phytosanitaires n'établiront pas de discrimination entre les pays exportateurs dans lesquels la situation de l'organisme nuisible concerné est la même.	C	(459) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 18 May 2023 11:49 PM] Red – the text is from ISPM11
643	appliquées pour prévenir ou réduire l'infestation <i>initiale</i> dans la plante cultivée;	C	Category : SUBSTANTIVE (1067) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM) supprimer "initiale"
657	Pendant une période de végétation exempte d'organisme nuisible, un suivi est mis en œuvre afin de vérifier que l'organisme nuisible n'est pas détecté, en s'appuyant sur les cycles biologiques de cet organisme et de son hôte. Les périodes de	C	Category : TECHNICAL (1356) Chad (26 Sep 2023 3:54 PM) Ce paragraphe doit être considéré comme une option pendant la plantation. Le suivi et

	végétation exemptes sont parfois associées à des programmes de lutte contre l'organisme nuisible.		la mise en oeuvre des programmes de lutte contre l'organisme nuisible pendant la plantation permettent de maintenir une végétation exempte d'organismes nuisibles
659	Des mesures peuvent être appliquées pendant la production en vue de gérer des organismes nuisibles spécifiques. Il peut s'agir de l'application de produits agrochimiques, d'agents de lutte biologique, de mesures d'exclusion physique de l'organisme nuisible, de mesures de confusion sexuelle ou de méthodes de surveillance et d'entretien. L'entretien désigne ici les activités visant à retirer les matières susceptibles d'attirer ou d'héberger des organismes de quarantaine, par exemple le ramassage <u>et le brûlage</u> des fruits tombés au sol dans les vergers, la destruction ou l'enfouissement des résidus de récolte, la lutte contre les plantes adventices ou d'autres activités similaires	P	<p>Category : TECHNICAL (1068) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM) Parmi les fruits tombés, il peut y avoir ceux attaqués par les ON, les ramasser sans les brûler, ils favorisent la croissance desdits ON qui attaquaient les productions ultérieures</p>
660	Les mesures physiques d'exclusion des organismes nuisibles peuvent inclure la culture dans des conditions protégées (par exemple culture en serre ou ensachage des fruits).	C	<p>Category : SUBSTANTIVE (1069) IPPC Regional Workshop Africa (23 Sep 2023 3:26 PM) "culture sous serre"</p>
755	On peut modifier l'incertitude en ajustant la sévérité des mesures ou en évaluant le caractère redondant. Les mesures devraient être adaptées au risque phytosanitaire, mais il peut être techniquement justifié d'exiger des mesures phytosanitaires pour compenser l'incertitude. Dans certains cas, l'incertitude devrait être déterminée (source et degré d'incertitude) et, dans la mesure du possible, gérée. Les mesures phytosanitaires devraient donc être ajustées une fois que l'incertitude a été réduite.	C	<p>Category : TECHNICAL (1412) São Tomé and Príncipe (26 Sep 2023 10:08 PM) des mesures ou en évaluant.....</p>
755	On peut modifier l'incertitude en ajustant la sévérité des mesures ou en en évaluant le caractère redondant. Les mesures devraient être adaptées au risque phytosanitaire, mais il peut être techniquement justifié d'exiger des mesures phytosanitaires pour compenser l'incertitude. Dans certains cas, l'incertitude devrait être déterminée (source et degré d'incertitude) et, dans la mesure du possible, gérée. Les mesures phytosanitaires devraient donc être ajustées une fois que l'incertitude a été réduite.	C	<p>Category : TECHNICAL (1411) São Tomé and Príncipe (26 Sep 2023 9:52 PM) en ajustant la sévérité des mesures ou en évaluant.....</p>
799	ANNEXE 4: Risques environnementaux	C	<p>(460) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 6:04 PM] Red - The texts in Annex4 are from ISPM11. Some parts are editorially changed</p>

837	ANNEXE 5: Organismes vivants modifiés considérés comme organismes nuisibles	C	(461) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 6:05 PM] Red - The texts in Annex5 are from ISPM11. Some parts are editorially changed
981	ANNEXE 6: Analyse du risque phytosanitaire pour les végétaux considérés comme des organismes de quarantaine	C	(462) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 6:05 PM] Red - The texts in Annex6 are from ISPM11. Some parts are editorially changed
1091	APPENDICE 1: Diagramme de l'analyse du risque phytosanitaire	C	(463) Imported Comment (30 Jun 2023 6:33 PM) [Originally made by M.Sai on 21 May 2023 5:40 PM] Black - Appendix-1 from ISPM2 is revised