

2023 SECOND CONSULTATION

1 July – 30 September 2023

Compiled comments for 2023 Second Consultation: 1994-001_Draft 2022_Amends_ISPM5

Summary

Participants

Name	Summary
Bahrain	Bahrain agree with the draft
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.
Gabon	annexe validée
Singapore	Singapore is supportive of the draft amendments.
South Africa	GENERAL COMMENT: The NPPOZA accepts the proposed amendments of phytosanitary terms.

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S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged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> (101) Argentina (1 Oct 2023 4:19 AM) Argentina supports the COSAVE comments
G	(General Comment)	C	<i>Category : TECHNICAL</i> (100) Zambia (30 Sep 2023 11:38 PM) The revision is endorsed and supported
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (91) Peru (29 Sep 2023 11:26 PM) Peru agrees with the comments agreed upon as COSAVE
G	(General Comment)	C	<i>Category : EDITORIAL</i> (90) Paraguay (29 Sep 2023 8:57 PM) Paraguay de acuerdo con los comentarios de COSAVE.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (89) Canada (29 Sep 2023 8:14 PM) Canada does not have comments on the draft 2022 amendments to ISPM 5
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (88) Russian Federation (29 Sep 2023 4:33 PM)

			General Comment: The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (87) 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> (86) Switzerland (29 Sep 2023 1:29 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> (79) South Africa (28 Sep 2023 11:10 AM) GENERAL COMMENT: The NPPOZA accepts the amendment of proposed phytosanitary terms.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (74) New Zealand (28 Sep 2023 9:16 AM) New Zealand supports the APPPC regional comments
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (71) India (27 Sep 2023 10:51 AM) India supports the proposed amendments
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (70) United Kingdom (26 Sep 2023 5:23 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	<i>Category : SUBSTANTIVE</i> (69) APPPC (26 Sep 2023 11:00 AM) To have list of all the terms of ISPM 5 in the beginning of the document. Within all ISPMs, ISPM 5 terminology should be marked such as bold or in italic form.
G	(General Comment)	C	<i>Category : EDITORIAL</i>


			(20) Korea, Republic of (28 Aug 2023 8:59 AM) Korea supports APPPC comment on this ISPM.
G	(General Comment)	C	<i>Category : EDITORIAL</i> (68) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:35 PM) Guyana has no objection to the draft amendments to ISPM 5.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (67) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:35 PM) St Lucia has no objections.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (66) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:35 PM) St. Vincent and the Grenadines is in general agreement with the proposed definitions.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (61) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) Changes to definitions acceptable.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (60) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) le Mali, approuve les différents ajouts à la définition de certains termes du glossaire phytosanitaire comme la surveillance générale, la surveillance spécifique, la procédure phytosanitaire, le test.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (59) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) We support the draft 2022 Amendments to ISPM5
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (58) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) We support draft 2022 amendments to ISPM 5
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (57) IPPC Regional Workshop

			Africa (23 Sep 2023 3:19 PM) We support the draft 2022 Amendments
G	(General Comment)	C	<i>Category : TECHNICAL</i> (56) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) I agree with this ISPM proposals.
G	(General Comment)	C	<i>Category : EDITORIAL</i> (43) PPPO (17 Sep 2023 8:34 PM) Proposed revision of test: serological should be deleted if covered under molecular.
G	(General Comment)	C	<i>Category : EDITORIAL</i> (42) PPPO (17 Sep 2023 8:34 PM) Agreed with proposed revision or definition of general surveillance, surveillance, phytosanitary action, phytosanitary procedure, release of a consignment and inspection.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (31) Malawi (5 Sep 2023 6:25 PM) We support the draft 2022 Amendments to ISPM5
G	(General Comment)	C	<i>Category : EDITORIAL</i> (30) Guyana (4 Sep 2023 12:08 AM) Guyana has no objection to the draft amendments to ISPM 5.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (16) Egypt (21 Aug 2023 10:09 AM) In consensus with the proposed revision made in terms.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (21) Kenya (28 Aug 2023 3:39 PM) Kenya is in agreement with the proposed definitions of terms
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (19) Mozambique (23 Aug 2023 1:42 PM) Mozambique agree with proposed amendments in the ISPM 5 as the aims is to give more consistence for the definition without obstructing the context
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (18) Thailand (22 Aug 2023 6:44 AM) Thailand agreed with the proposed draft 2022 amendments to ISPM 5: Glossary of

			phytosanitary terms
44	Proposed addition	C	<p><i>Category : SUBSTANTIVE</i> (72) China (28 Sep 2023 6:41 AM) China support APPPC comments. To have a list of all the terms of ISPMs in front of this document. To facilitate the readers get whole idea and quick search for certain terms.</p>
45	general surveillance	C	<p><i>Category : SUBSTANTIVE</i> (83) Australia (29 Sep 2023 6:58 AM) Australia supports this revised definition of general surveillance and thanks the Steward and Standards Committee for your perseverance with this definition. Australia considers that this proposed definition of general surveillance accurately captures the facets of general surveillance as outlined in ISPM 6. Additionally, it is important that the definition of 'general surveillance' be defined in such a way that it allows relevant information to be collected from sources that are not necessarily 'official' (e.g. research papers, industry surveillance data etc) but are still fundamental to considering the whole picture of pest presence/absence/distribution. General surveillance covers a broad range of activities and information sources and this current proposed definition accurately reflects that.</p>
45	general surveillance	C	<p><i>Category : SUBSTANTIVE</i> (75) New Zealand (28 Sep 2023 9:17 AM) The definitions of surveillance are not needed as they are better defined in ISPM 6</p>
45	general surveillance	C	<p><i>Category : SUBSTANTIVE</i> (37) PPPO (17 Sep 2023 8:34 PM) PPPO suggests this definition of 'general surveillance' be deleted as it is already better described in ISPM 6.</p>
45	general surveillance	C	<p><i>Category : SUBSTANTIVE</i> (36) PPPO (17 Sep 2023 8:34 PM) The definitions of surveillance are not needed as they are better defined in ISPM 6</p>

47	A process whereby information on pests in an area is obtained through various sources other than surveys .	C	<p><i>Category : SUBSTANTIVE</i> (98) Barbados (30 Sep 2023 7:21 PM) Barbados agrees to the addition.</p>
47	<u>A</u> An official process whereby information on pests in an area is obtained through various sources other than surveys .	P	<p><i>Category : SUBSTANTIVE</i> (92) Costa Rica (30 Sep 2023 5:47 AM) The overall general surveillance process must be understood as an official process (despite using also unofficial sources); otherwise, the implication could be e.g. that any research or other institution in a country could claim to be competent in verifying any pest observation. In addition for consistency with the definition of the related terms "specific surveillance" and "surveillance". Furthermore, for consistency with ISPM 6</p>
47	<u>A</u> An official process whereby information on pests in an area is obtained through various <u>non-official and official</u> sources other than surveys .	P	<p><i>Category : SUBSTANTIVE</i> (80) European Union (28 Sep 2023 7:47 PM) 1) Addition of "official" before "process"</p> <p>It is potentially dangerous if the process of 'General surveillance' is not understood and explicitly characterized as being official, because this could open for the opportunity of any individual or institution to claim that any of its field activities are an element of 'General surveillance' of that country (including of a country, where that individual or institution is not a resident !), even if not recognized and endorsed as being so by the actual NPPO.</p> <p>The argument that 'Surveillance' is in any case official (and that therefore 'General surveillance' needs not be explicitly described as official) is incorrect, in that 'General surveillance' is not defined as a subset of 'Surveillance' (it is NOT said: "General surveillance = Surveillance whereby information...."), so therefore characteristics of 'Surveillance' are not automatically characteristics of 'General surveillance'.</p> <p>2) Addition of "non-official and official"</p>


			before "sources"
			This addition is proposed to clarify that whereas the overall general surveillance process is official (i.e. exclusively an NPPO responsibility), the various sources of information can be official or unofficial, as explained in ISPM 6.
47	A- <u>official</u> process whereby information on pests in an area is obtained through various sources other than surveys .	P	<p><i>Category : SUBSTANTIVE</i> (73) China (28 Sep 2023 6:41 AM) According to the Glossary definition of surveillance, surveillance is "an official process". Therefore, whether general surveillance is related to survey or not, it should be official.</p>
47	A process whereby information on pests in an area is obtained through various sources other than surveys .	C	<p><i>Category : SUBSTANTIVE</i> (62) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:35 PM) Barbados agrees with the addition</p>
47	A <u>An official</u> process whereby information on pests in an area is obtained through various <u>non-official and official</u> sources other than surveys .	P	<p><i>Category : SUBSTANTIVE</i> (50) EPPO (19 Sep 2023 9:42 AM) 1) Addition of "official" before "process"</p> <p>It is potentially dangerous if the process of 'General surveillance' is not understood and explicitly characterized as being official, because this could open for the opportunity of any individual or institution to claim that any of its field activities are an element of 'General surveillance' of that country (including of a country, where that individual or institution is not a resident !), even if not recognized and endorsed as being so by the actual NPPO.</p> <p>The argument that 'Surveillance' is in any case official (and that therefore 'General surveillance' needs not be explicitly described as official) is incorrect, in that 'General surveillance' is not defined as a subset of 'Surveillance' (it is NOT said: "General surveillance = Surveillance whereby information...."), so therefore characteristics of 'Surveillance' are not</p>

		<p>automatically characteristics of 'General surveillance'.</p> <p>2) Addition of "non-official and official" before "sources"</p> <p>This addition is proposed to clarify that whereas the overall general surveillance process is official (i.e. exclusively an NPPO responsibility), the various sources of information can be official or unofficial, as explained in ISPM 6.</p>
47	A An official process whereby information on pests in an area is obtained through various sources other than surveys.	<p>P</p> <p><i>Category : SUBSTANTIVE</i></p> <p>(44) IPPC Regional Workshop Latin America (18 Sep 2023 8:26 PM)</p> <p>The overall general surveillance process must be understood as an official process (despite using also unofficial sources); otherwise, the implication could be e.g. that any research or other institution in a country could claim to be competent in verifying any pest observation. In addition for consistency with the definition of the related terms "specific surveillance" and "surveillance". Furthermore, for consistency with ISPM 6</p>
47	A An official process whereby information on pests in an area is obtained through various sources other than surveys.	<p>P</p> <p><i>Category : SUBSTANTIVE</i></p> <p> Mexico</p> <p>(32) Mexico (13 Sep 2023 6:19 PM)</p> <p>Although it is recommended not to use the word "official" where it is redundant, adding official is to be consistent with ISMP 6. Surveillance of regulated pests is the first line within NPPOs phytosanitary strategies for the timely detection of pests that there are threats or potential threats in a country and that it is essential not to limit ourselves to these, but to work with all those of socioeconomic interest in each country.</p>
47	A An official process whereby information on pests in an area is obtained through various sources other than surveys.	<p>P</p> <p><i>Category : TECHNICAL</i></p> <p>(11) COSAVE (17 Aug 2023 9:26 PM)</p> <p>The overall General surveillance process MUST be understood as an official process (despite utilizing also unofficial sources); otherwise, the implication could be e.g. that any research or other institution in a country</p>

			could claim to be competent in verifying any pest observation. In addition for consistency with the definition of the related terms specific surveillance and surveillance. Furthermore, for consistency with ISPM 6
47	A An official process whereby information on pests in an area is obtained through various sources other than surveys.	P	Category : TECHNICAL (8) Uruguay (15 Aug 2023 7:04 PM) The overall General surveillance process MUST be understood as an official process (despite utilizing also unofficial sources); otherwise, the implication could be e.g. that any research or other institution in a country could claim to be competent in verifying any pest observation. In addition for consistency with the definition of the related terms specific surveillance and surveillance. Furthermore, for consistency with ISPM 6
74	Proposed revision	C	Category : SUBSTANTIVE (15) Peru (18 Aug 2023 11:12 PM) Implica actualizar la version de la NIMF 6, respecto a la vigilancia específica y el término caduco de "encuesta" en la version en español del acápite 2.2
75	Surveillance	C	Category : SUBSTANTIVE (76) New Zealand (28 Sep 2023 9:18 AM) The definitions of surveillance are not needed as they are better defined in ISPM 6
75	Surveillance	C	Category : TECHNICAL (52) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) amendement accepté
75	Surveillance	C	Category : SUBSTANTIVE (38) PPPO (17 Sep 2023 8:34 PM) The definitions of surveillance are not needed as they are better defined in ISPM 6
77	An official process whereby information on pests in an area is obtained through <u>general surveillance, specific surveillance</u> or a combination of both which collects and records data on pest presence or absence by <u>survey, monitoring</u> or other procedures	C	Category : SUBSTANTIVE (95) Barbados (30 Sep 2023 7:19 PM) Barbados agrees to the revision.
77	An A official process whereby information on pests in an area is obtained through <u>general surveillance, specific surveillance</u> or a combination of both which collects	P	Category : SUBSTANTIVE (84) Australia (29 Sep 2023 7:01 AM) If the proposed definition of General

	and records data on pest presence or absence by survey, monitoring or other procedures		Surveillance is retained "official" needs to be removed from this definition for it to make sense. This proposed definition links back to the definitions of "specific surveillance" and "general surveillance" and Australia agrees that "general surveillance" is not "official". Removing "official" here does not impact the "official" nature of "specific surveillance", as it's definition already refers to "surveys" which are already defined as "official".
77	An official process <u>whereby information on pests in an area is obtained through general surveillance, specific surveillance or a combination of both</u> which collects and records data on pest presence or absence by survey, monitoring or other procedures	C	<i>Category : SUBSTANTIVE</i> (63) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:35 PM) Barbados agrees with the proposed revision.
77	An official process <u>which collects the</u> whereby information on pests in an area is obtained through <u>general surveillance, specific surveillance or a combination of both</u> which collects and records data on pest presence or absence by survey, monitoring or other procedures	P	<i>Category : SUBSTANTIVE</i> (53) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM)
77	An Anofficial process whereby information on pests in an area is obtained through general surveillance, specific surveillance or a combination of both which collects and records data on pest presence or absence by survey, monitoring or other procedures	P	<i>Category : SUBSTANTIVE</i> (39) PPPO (17 Sep 2023 8:34 PM) PPPO suggests the word 'official' be removed from the definition. If the definition of 'general surveillance' is retained (not deleted as proposed by PPPO), this revised definition of surveillance will make processes under general surveillance 'official'.
77	An official process <u>whereby information on pests in an area is obtained through general surveillance, specific surveillance or a combination of both</u> which collects and records data on pest presence or absence by survey, monitoring or other procedures	C	<i>Category : EDITORIAL</i> (26) Ghana (30 Aug 2023 11:07 PM) General and specific surveillance should be merged because specificity only comes in when the pest has been identified
77	<u>An official process whereby information on pests in an area is obtained through general surveillance, specific surveillance or a combination of both</u> which collects and records data on pest presence or absence by survey, monitoring or other procedures	C	<i>Category : EDITORIAL</i> (22) Syrian Arab Republic (29 Aug 2023 12:24 PM) I agree
77	An official process <u>whereby information on pests in an area is obtained through general surveillance, specific surveillance or a combination of both</u> which collects and records data on pest presence or absence by survey, monitoring or other	C	<i>Category : TECHNICAL</i> (7) CA (14 Aug 2023 11:01 PM) We agree with the proposal, in this regard, it is necessary to modify the version of ISPM 6, regarding specific surveillance and the

	procedures		outdated terms of "survey" in the Spanish version of section 2.2
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures or to enable phytosanitary certification	C	<i>Category : SUBSTANTIVE</i> (96) Barbados (30 Sep 2023 7:19 PM) Barbados agrees to the revision.
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures or to enable phytosanitary certification	P	<i>Category : TECHNICAL</i> (93) Costa Rica (30 Sep 2023 5:47 AM) Although a phytosanitary action is certainly carried out based on a procedure, it is somewhat redundant to point it out in the definition. This inserted text adds complexity to the definition without providing a better understanding of the concept.
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures or to enable phytosanitary certification	P	<i>Category : TECHNICAL</i> (81) European Union (28 Sep 2023 7:48 PM) It is questionable that every phytosanitary action needs a phytosanitary procedure. Certainly the insertion of "with reference to a phytosanitary procedure" burdens the definition without providing more clarity.
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures or to enable phytosanitary certification	C	<i>Category : SUBSTANTIVE</i> (64) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:35 PM) Barbados agrees to the proposed revision.
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures or to enable phytosanitary certification	P	<i>Category : TECHNICAL</i> (48) EPP0 (19 Sep 2023 9:35 AM) It is questionable that every phytosanitary action needs a phytosanitary procedure. Certainly the insertion of "with reference to a phytosanitary procedure" burdens the definition without providing more clarity.
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures or to enable phytosanitary certification	P	<i>Category : SUBSTANTIVE</i> (45) IPPC Regional Workshop Latin America (18 Sep 2023 8:26 PM) Although a phytosanitary action is certainly carried out based on a procedure, it is somewhat redundant to point it out in the definition. This inserted text adds complexity to the definition without providing a better understanding of the concept.
108	An official operation, such as inspection, undertaken testing, surveillance or	P	<i>Category : SUBSTANTIVE</i>

	treatment, undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures <u>or to enable phytosanitary certification</u>		(40) PPPO (17 Sep 2023 8:34 PM) PPPO suggests deleting the examples (as this is not an exhaustive list of phytosanitary actions) in order to shorten the definition and retain the link with phytosanitary procedure. PPPO also requests the SC to re-look at the definition as the word 'phytosanitary' is used in the definition three times.
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures <u>or to enable phytosanitary certification</u>	P	<i>Category : SUBSTANTIVE</i>  Mexico (34) Mexico (13 Sep 2023 7:28 PM) For clarity, we furthermore suggest deleting the sentence" with reference to a phytosanitary procedure" of the definition. This inserted text is not needed, adds complexity to the definition without providing a better understanding of the concept
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken <u>with reference to a phytosanitary procedure</u> , to implement phytosanitary measures <u>or to enable phytosanitary certification</u>	C	<i>Category : EDITORIAL</i> (23) Syrian Arab Republic (29 Aug 2023 12:28 PM) I agree
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures <u>or to enable phytosanitary certification</u>	P	<i>Category : TECHNICAL</i> (12) COSAVE (17 Aug 2023 9:29 PM) Although a phytosanitary action is certainly carried out based on a procedure, it is somewhat redundant to point it out in the definition. This inserted text adds complexity to the definition without providing a better understanding of the concept
108	An official operation, such as inspection, testing, surveillance or treatment , undertaken with reference to a phytosanitary procedure , to implement phytosanitary measures <u>or to enable phytosanitary certification</u>	P	<i>Category : TECHNICAL</i> (9) Uruguay (15 Aug 2023 7:05 PM) Although a phytosanitary action is certainly carried out based on a procedure, it is somewhat redundant to point it out in the definition. This inserted text adds complexity to the definition without providing a better understanding of the concept
108	An official operation, such as inspection, testing, surveillance, quarantine or treatment , undertaken <u>with reference to a phytosanitary procedure</u> , to implement phytosanitary measures <u>or to enable phytosanitary certification</u>	P	<i>Category : SUBSTANTIVE</i> (5) CA (12 Aug 2023 1:41 AM) Include quarantine as an official action, since it is an activity that NPPOs apply as a phytosanitary measure.

125	Any official method <u>on how to perform a phytosanitary action for implementing phytosanitary measures including the performance of inspections, tests, surveillance or treatments in connection with regulated pests</u>	C	<i>Category : SUBSTANTIVE</i> (97) Barbados (30 Sep 2023 7:20 PM) Barbados agrees to the revision.
125	Any official method <u>on how to perform a phytosanitary action for implementing phytosanitary measures including the performance of inspections, tests, surveillance or treatments in connection with regulated pests</u>	C	<i>Category : SUBSTANTIVE</i> (65) Caribbean Agricultural Health and Food Safety Agency (25 Sep 2023 9:35 PM) Barbados agrees to the proposed revision
125	<u>Any official method on how to perform a phytosanitary action for implementing phytosanitary measures including the performance of inspections, tests, surveillance or treatments in connection with regulated pests</u>	C	<i>Category : TECHNICAL</i> (24) Syrian Arab Republic (29 Aug 2023 12:31 PM) i agree
178	Test	C	<i>Category : SUBSTANTIVE</i> (78) New Zealand (28 Sep 2023 9:22 AM) DO we need this definition at all?
178	Test	C	<i>Category : TECHNICAL</i> (54) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) amendement accepté
178	Test	C	<i>Category : SUBSTANTIVE</i> (41) PPPO (17 Sep 2023 8:34 PM) If this is to distinguish test from phytosanitary inspection, suggest replacing 'test' with 'phytosanitary test'. Or is this definition needed at all?
179	Official examination, <u>using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests, or determine if regulated pests are present, or determine compliance <u>verify conformity</u> with specific phytosanitary requirements</u>	P	<i>Category : EDITORIAL</i> (99) Barbados (30 Sep 2023 7:26 PM) The removal of 'or' ' ' shows that one activity is not dependent on the other.
179	Official examination, <u>other than inspection</u> using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles , other than visual , <u>to identify to pests</u> or determine if regulated pests are present, <u>identify pests</u> or determine compliance <u>verify conformity</u> with specific phytosanitary requirements	P	<i>Category : TECHNICAL</i> (94) Costa Rica (30 Sep 2023 5:50 AM) other than inspection" added to clarify the distinction between inspection and test. Change order to better reading. In addition, tests are used to determine if pests are present, not only regulated pests, but pests in general
179	Official examination, <u>using for example chemical of plants, molecular, serological,</u>	P	<i>Category : SUBSTANTIVE</i>

	<p>plant products or morphological characterization other regulated articles, of plants, plant products or other regulated articles, other than visual, to identify pests or determine if regulated pests are present, or to determine compliance verify conformity with specific phytosanitary requirements requirements using for example chemical, molecular, serological, or morphological characterization.</p>	<p>(85) Australia (29 Sep 2023 7:03 AM) By having the examples at the end, it is clearer that the "chemical, molecular serological or morphological characterisation" could be on the plant (in the case of an internal bacterium for example that is not cultured prior to testing) or the pest (in the case of an invertebrate where it, and not the plant would undergo "molecular or morphological characterisation").</p>
<p>179</p>	<p>Official examination, using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, other than visual to identify pests determine if or determine if regulated pests are present, identify pests or determine compliance verify conformity with specific phytosanitary requirements</p>	<p>P <i>Category : SUBSTANTIVE</i> (82) European Union (28 Sep 2023 7:52 PM) 1) Reinsertion of "other than visual" which was proposed for deletion Removing any reference to "other than visual" would blur the distinction between the definitions of 'Inspection' and 'Test' and therefore the intention to define them as disjunctive. A strong distinction is important to fully appreciate the legislation of some countries (i.e. their phytosanitary import requirements). 2) Deletion of the proposed addition "morphological characterization" We do not believe that "morphological characterization" is a good example of a 'Test'. In fact, morphological characterization can be carried out by 'visual examination' in the field or at the border by the inspector, and in this case it is not a 'Test' but an 'Inspection' (which is defined as an "official visual examination..."). Consequently, adding "morphological characterization" to the definition of 'Test' would blur the distinction between the definitions of 'Inspection' and 'Test'. 3) Deletion of the proposed addition of "regulated" before "pests"</p>


		<p>We do not agree with the insertion of "regulated" ("... determine if regulated pests are present..."), in contrast to the definition of Inspection ("...determine if pests are present..."), because:</p> <p>(a) "Regulated" unnecessarily restricts the definition, contradicting real-life phytosanitary situations where tests are used to determine if certain pests (whether currently regulated or not) are present.</p> <p>(b) The proposed insertion of "regulated", distinctive to tests in contrast to inspections, seems to have no foundation in any ISPM.</p> <p>(c) We do not recall any consultation comment, through all these years of debate on 'Inspection' and 'Test', suggesting such insertion in order to distinguish the two actions.</p> <p>4) Limiting the revision of the definition of 'test' to consistency changes</p> <p>In addition to the above questions, some wonder:</p> <ul style="list-style-type: none"> - whether "samples consisting of" should be added after "examination of" (the sample being the object of the test and allowing its traceability), - whether "regulated" should be deleted before "articles", - whether "or organisms" should be added after "articles" (for cases where an inspector sends only the suspected pest to the laboratory, for example for the identification of larvae by molecular methods), - whether the examples of test methods proposed to be added should be replaced by the addition of "using diagnostic protocols" before "to identify pests". <p>As we think that we will not get agreement about the proposed revised definition of "test", and as the proposed revised definition of "inspection" was agreed by the SC-7 in May 2023 and is recommended to</p>
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		<p>the SC for approval for adoption by the CPM, we suggest that the proposed revised definition of 'Test' only includes the small changes necessary to ensure consistency with the proposed revised definition of 'Inspection', because the other proposed changes (i.e. the addition of "morphological characterization", the deletion of "other than visual" and the addition of "regulated") give rise to problems. On the other hand, although they are not perfect, the current definitions of 'Inspection' and 'Test' do not appear to pose problems for the understanding of ISPMs.</p> <p>In fact, we understand that the TPG's main intention in the revision of 'Inspection' and 'Test' had been merely to make small adjustments for consistency, with the main revision being the term "compliance procedure (for a consignment)" which was adopted by CPM-17.</p> <p>We therefore propose that the only change to the definition of "test" is to replace "determine compliance" with "verify conformity". The explanation of these consistency changes is given in paragraphs 172 and 173 of the Draft 2022 Amendments to ISPM 5: [172] Through Article VII.2f of the Convention and the definition of compliance procedure (for a consignment), the terms 'compliance' and 'non-compliance' are linked with consignments, and the 'General recommendations on use of terms in ISPMs' stipulates 'conformity' be used in other cases. As test has a broader scope than only consignments, the term 'compliance' is therefore substituted by 'conformity'. [173] The word 'determine' in relation to "compliance" is substituted by 'verify' in consistency with wording in similar definitions.</p>
179	Official examination, using for example chemical, molecular, serological, or	C <i>Category : SUBSTANTIVE</i>

	<u>morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests or determine if regulated pests are present, or determine compliance-verify conformity with specific phytosanitary requirements</u>		(77) New Zealand (28 Sep 2023 9:19 AM) 1. If this is to distinguish test from phytosanitary inspection, suggest replacing 'test' with 'phytosanitary test'. Or is this definition needed at all? 2. It is sensible to not include the examples in the definition, especially if the list is not inclusive or can be out of date. 3. Suggest adding bioassay (ie. Pathogenicity tests, Grow out tests, bioindicators) if the examples are kept.
179	Official examination, using for example chemicalchemical or molecular analyse, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests or determine if regulated pests are present, or determine compliance-verify conformity with specific phytosanitary requirements	P	<i>Category : SUBSTANTIVE</i> (55) IPPC Regional Workshop Africa (23 Sep 2023 3:19 PM) I think serological is not appropriate for the plant
179	Official examination, using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, other than visual, to identify pests determine if or determine if regulated pests are present, identify pests or determine compliance-verify conformity with specific phytosanitary requirements	P	<i>Category : SUBSTANTIVE</i> (51) EPP0 (19 Sep 2023 9:49 AM) 1) Reinsertion of "other than visual" which was proposed for deletion Removing any reference to "other than visual" would blur the distinction between the definitions of 'Inspection' and 'Test' and therefore the intention to define them as disjunctive. A strong distinction is important to fully appreciate the legislation of some countries (i.e. their phytosanitary import requirements). 2) Deletion of the proposed addition "morphological characterization" We do not believe that "morphological characterization" is a good example of a 'Test'. In fact, morphological characterization can be carried out by 'visual examination' in the field or at the border by the inspector, and in this case it is not a 'Test' but an 'Inspection' (which is defined as an "official visual examination..."). Consequently, adding "morphological characterization" to the definition of 'Test'

		<p>would blur the distinction between the definitions of 'Inspection' and 'Test'.</p> <p>3) Deletion of the proposed addition of "regulated" before "pests"</p> <p>We do not agree with the insertion of "regulated" ("... determine if regulated pests are present..."), in contrast to the definition of Inspection ("...determine if pests are present..."), because:</p> <p>(a) "Regulated" unnecessarily restricts the definition, contradicting real-life phytosanitary situations where tests are used to determine if certain pests (whether currently regulated or not) are present.</p> <p>(b) The proposed insertion of "regulated", distinctive to tests in contrast to inspections, seems to have no foundation in any ISPM.</p> <p>(c) We do not recall any consultation comment, through all these years of debate on 'Inspection' and 'Test', suggesting such insertion in order to distinguish the two actions.</p> <p>4) Limiting the revision of the definition of 'test' to consistency changes</p> <p>In addition to the above questions, some wonder:</p> <ul style="list-style-type: none"> - whether "samples consisting of" should be added after "examination of" (the sample being the object of the test and allowing its traceability), - whether "regulated" should be deleted before "articles", - whether "or organisms" should be added after "articles" (for cases where an inspector sends only the suspected pest to the laboratory, for example for the identification of larvae by molecular methods), - whether the examples of test methods proposed to be added should be replaced by the addition of "using diagnostic protocols" before "to identify pests".
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			therefore substituted by 'conformity'. [173] The word 'determine' in relation to "compliance" is substituted by 'verify' in consistency with wording in similar definitions.
179	Official examination, other than inspection, using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests <u>identify pests</u> determine if or determine if regulated pests are present, identify pests or determine compliance-verify conformity with specific phytosanitary requirements	P	<i>Category : TECHNICAL</i> (46) IPPC Regional Workshop Latin America (18 Sep 2023 8:26 PM) "other than inspection" added to clarify the distinction between inspection and test. Change order to better reading. In addition, tests are used to determine if pests are present, not only regulated pests, but pests in general
179	Official examination, other than inspection, using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests <u>identify pests</u> determine if or determine if regulated pests are present, identify pests or determine compliance-verify conformity with specific phytosanitary requirements	P	<i>Category : SUBSTANTIVE</i>  Mexico (35) Mexico (15 Sep 2023 2:03 AM) Suggest to change order for better wording. Add new wording as it is important to take into account the to clarify the distinction between inspection and test
179	Official examination, using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests <u>or determine if regulated pests</u> are present, or determine compliance-verify conformity with specific phytosanitary requirements	C	<i>Category : TECHNICAL</i> (28) Gabon (31 Aug 2023 3:30 PM) Nous préférons garder l'ancienne définition car elle renferme tout type de test que nous pouvons effectuer tandis que la définition proposée est restreinte à un type de tests.
179	Official examination, using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests <u>or determine if regulated pests</u> are present, or determine compliance-verify conformity with specific phytosanitary requirements	C	<i>Category : EDITORIAL</i> (27) Ghana (30 Aug 2023 11:11 PM) The current definition is clearer and easily defined
179	Official examination, using for example chemical, molecular, serological, or morphological characterization, of plants, plant products or other regulated articles, other than visual, to identify pests <u>or determine if regulated pests</u> are present, or determine compliance-verify conformity with specific phytosanitary requirements	C	<i>Category : TECHNICAL</i> (25) Syrian Arab Republic (29 Aug 2023 12:41 PM) Official examination, using for example chemical, molecular, serological, or morphological - or other characterization, of plants, plant products or other regulated articles, other than visual, to identify pests or determine if regulated pests are present, or determine compliance verify conformity

			with specific phytosanitary requirements
179	Official examination, using for example chemical, molecular, serological, or morphological characterization , of plants, plant products or other regulated articles , other than visual , to identify pests or determine if regulated pests are present, or determine compliance <u>verify conformity</u> with specific phytosanitary requirements	C	<i>Category : TECHNICAL</i> (17) United States of America (21 Aug 2023 7:30 PM) Would morphological characterization be covered under the term "Visual examination"?
179	Official examination, using for example chemical, molecular, serological, or morphological characterization , of plants, plant products or other regulated articles , other than visual , to identify pests or determine if regulated pests are present, identify pests or determine compliance <u>verify conformity</u> with specific phytosanitary requirements	P	<i>Category : TECHNICAL</i> (14) COSAVE (17 Aug 2023 9:39 PM) Change order to better reading. In addition, test are used to determine if pest are present not only regulated pest, but pest in general.
179	Official examination, other than inspection , using for example chemical, molecular, serological, or morphological characterization , of plants, plant products or other regulated articles , other than visual , to identify pests or determine if regulated pests are present, or determine compliance <u>verify conformity</u> with specific phytosanitary requirements	P	<i>Category : TECHNICAL</i> (13) COSAVE (17 Aug 2023 9:38 PM) to clarify the distinction between inspection and test.
179	Official examination, other than inspection using for example chemical, molecular, serological, or morphological characterization , of plants, plant products or other regulated articles , other than visual , to identify pests determine if or determine if regulated pests are present, identify pests or determine compliance <u>verify conformity</u> with specific phytosanitary requirements	P	<i>Category : TECHNICAL</i> (10) Uruguay (15 Aug 2023 7:10 PM) "other than inspection" added to clarify the distinction between inspection and test. Change order to better reading. In addition, tests are used to determine if pests are present not only regulated pests, but pests in general
179	Official Official examination, <u>using scientifically proven diagnostic methodologies on plants, plant products, and other regulated articles, to identify pests, determine whether regulated pests are present, or verify compliance with specific phytosanitary requirements.</u> , using for example chemical, molecular, serological, or morphological characterization , of plants, plant products or other regulated articles , other than visual , to identify pests or determine if regulated pests are present, or determine compliance <u>verify conformity</u> with specific phytosanitary requirements	P	<i>Category : SUBSTANTIVE</i> (6) CA (12 Aug 2023 1:49 AM) The proposed text identifies only 4 diagnostic methodologies; it is possible that in time another undescribed diagnostic method may be found.