Update on activities of the Technical Panel for the Glossary from JUNE 2023 to April 2024[[1]](#footnote-2)

*(Prepared by the IPPC Secretariat with inputs from the TPG Steward and Assistant Steward)*

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1. BACKGROUND

1.1 Stewards and membership

1. The stewards for the Technical Panel for the Glossary (TPG) are:

* Álvaro SEPÚLVEDA LUQUE (Steward)
* Ebbe Nordbo (Assistant Steward)

|  |  |  |
| --- | --- | --- |
| **Name** | **Language** | **End of term** |
| Mr Álvaro SEPÚLVEDA LUQUE (Steward) (Chile) |  | 2024 |
| Mr Ebbe Nordbo (Assistant steward) (Denmark) | English | 2024 (3rd term) |
| Ms Laurence BOUHOT-DELDUC (France) | French | 2028 (3rd term) |
| Ms Beatriz Melcho (Uruguay) | Spanish | 2025 (3rd term) |
| Mr Rajesh RAMARATHNAM (Canada) | English | 2023 (1st term) |
| Ms Asenath Abigael KOECH (Kenya) | English | 2026 (2nd term) |
| Ms Shaza Roshdy OMAR (Egypt) | Arabic | 2027 (3rd term) |
| Mr Konstantin GREBENNIKOV (Russian Federation) | Russian | 2025 (1st term) |
| Ms Xuemei JI (Australia) | Chinese | 2026 (1st term) |
| Ms Patricia Raquel CARUA GUAIGUA (Ecuador) | Spanish | 2027 (1st term) |

**Table 1.** TPG membership as of February 2024.

1. A call for the second Spanish language expert for the TPG was opened following the decision of the SC at its meeting in November 2022 (decision point 31 of the SC November 2022 meeting report). The SC, during its meeting in May 2023, requestedthat the secretariat seek additional information from the candidates nominated. The SC, through an e-decision (25 July – 8 August 2023) and subsequent poll, selected Patricia Raquel CARUA GUAIGUA as TPG member for the Spanish language. Her membership started in 2023 for a five-year period.
2. Following the ending of the term as TPG member for the English language of Rajesh RAMARATHNAM in 2023 and the inability of NPPO of Canada to extend his membership for a second 5-year period, the secretariat requests the SC to approve the opening of a call for a new English language expert for the TPG.
3. The secretariat thanks the NPPO of Canada and Rajesh RAMARATHNAM for his valuable contributions and unwavering commitment to the work of the TPG.
4. The secretariat also thanks Álvaro SEPÚLVEDA LUQUE for his commitment and stewardship for the TPG.

** Corresponding recommendations:** [**(1)**](#Rajesh1) **and** [**(2)**](#CallTPG2)

1.2 IPPC Secretariat support

1. The current IPPC Secretariat (hereafter referred to as “the secretariat”) TPG Lead is Artur SHAMILOV, with support from Daniel TORELLA and Aixa DEL GRECO.
2. The last TPG meeting took place at the local office of the Ministry of Agriculture, Livestock and Food Supply in Fortaleza, Brazil. The secretariat and the TPG thanked the NPPO of Brazil for hosting the meeting.

** Corresponding recommendation:** [**(3)**](#Brazil3)

1.3 Volume of work for the TPG from June 2023 to April 2024

1. The current TPG work programme includes the addition, revision, or deletion of eight glossary terms and definitions as enlisted in the *List of topics for IPPC standards* (LOT) as well as the review of adopted ISPMs.

**Figure 1.** Dynamic change of TPG work plan (2022-2024) prior to CPM-18 (2024).

1. In the period, the TPG worked on:

* Eight terms that are going to CPM-18 (2024) for adoption as part of the draft 2022 amendments to ISPM 5 (*Glossary of phytosanitary terms*);
* One subject that is currently under development, including eight proposed ink amendments (Appendix 1) going to SC May 2024 to be approved for noting by the CPM and three ink amendments going to CPM-18 (2024) for noting;
* Two subjects (“visual examination” and “emerging pest”) that were removed from the LOT by the SC;
* Update of the Annotated Glossary (refer to section 5.1 of this paper); and
* One paper on “Supplementary TPG paper on consistency recommendations on the draft revised PRA ISPMs for quarantine pests”.

1. Prior to CPM-18, the LOT was composed of:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Terms** | **Addition** | **Revision** | **Deletion** | **Ongoing** |
| “general surveillance” (2018-046) | To CPM-18 |  |  |  |
| “inspection” (2017-005) |  | To CPM-18 |  |  |
| “phytosanitary action” (2020-006) |  | To CPM-18 |  |  |
| “phytosanitary procedure” (2020-007) |  | To CPM-18 |  |  |
| “release (of a consignment)” (2021-007) |  | To CPM-18 |  |  |
| “specific surveillance*”* (2018-047) | To CPM-18 |  |  |  |
| “surveillance” (2020-009) |  | To CPM-18 |  |  |
| “test” (2021-005) |  | To CPM-18 |  |  |
| Review of the use of and/or in adopted ISPMs (2010-030) |  |  |  | Ongoing |

**Table 2.** Terms and status in the LOT prior to CPM-18 (2024).

2. REVIEW OF DRAFT ISPMs SENT FOR THE FIRST CONSULTATION IN 2023

1. In the period, the TPG provided proposals on terminology, consistency and translation on the following three draft ISPMs to their respective stewards:

* Draft *Reorganization and revision of pest risk analysis standards* (2020-001);
* Draft annex to ISPM 46 (*Commodity-based standards for phytosanitary measures*): International movement of mango (*Mangifera indica*) fruit (2021-011); and
* Draft annex to ISPM 39 (*International movement of wood*): Use of systems approaches in managing the pest risks associated with the movement of wood (2015-004).

1. In addition, the TPG provided proposals on terminology, consistency and translation to the CPM Focus Group on Sea Containers regarding the draft CPM Recommendation on *Sea containers* (R-06) that will be presented to the CPM-18 in 2024.
2. The TPG discussions are summarized below and references given to the relevant sections in the TPG December 2023 meeting report.[[2]](#footnote-3) All subsequent recommendations for SC decisions are provided at the end of the document and links to proposed decisions given under each section.
   1. Draft *Reorganization and revision of pest risk analysis standards* (2020-001), priority 1
3. The TPG reviewed the consultation comments on terminology, consistency and translation.
4. Details are reported in section 5.1 and appendix 4 of the December 2023 TPG meeting report available on the IPP.
5. **Quarantine pest.** The TPG noted the multitude of synonymous descriptions of a pest (during the pest risk analysis, before possibly becoming regulated as a quarantine pest) given in ISPM 2 (*Framework for pest risk analysis*), ISPM 11 and other ISPMs. The TPG recommended that only the following phrasing be used and all other phrasings avoided:

* the pest “has the characteristics of a quarantine pest”; and
* the pest “meets the criteria for a quarantine pest”.

1. **Supplementary paper.** The TPG elaborated a paper (Appendix 2) on the following consistency topics for consideration by the SC and by potential EWG on the holistic revision of the draft reorganized PRA standards:

* the use of “injury”, “consequences”, “effect” and similar terms;
* the avoidance of “direct effect” and “indirect effect”; and
* the use of “environmental consequences” over “environmental risk”.

1. With the supplementary paper, the TPG aimed at contributing to the use of a consistent and clear terminology and the avoidance of repetitive text.

** Corresponding recommendations:** [**(4)**](#PRA4) **and** [**(5)**](#PRASupplPa5)

2.2 Draft annex to ISPM 46 (*Commodity-based standards for phytosanitary measures*): International movement of fresh *Mangifera indica* fruit (2021-011), priority 1

1. The TPG reviewed the consultation comments on terminology, consistency and translation.
2. Details are reported in section 5.2 of the December 2023 TPG meeting report available on the IPP.

** Corresponding recommendation:** [**(6)**](#mango6)

2.3 Draft annex to ISPM 39 (*International movement of wood*): Use of systems approaches in managing the pest risks associated with the movement of wood (2015-004), priority 3

1. The TPG reviewed the consultation comments on terminology, consistency and translation.
2. Details are reported in section 5.3 of the TPG December 2023 meeting report available on the IPP.

** Corresponding recommendation:** [**(7)**](#wood7)

2.4 Draft CPM Recommendation on *Sea containers* (R-06)

1. The TPG reviewed the consultation comments on terminology, consistency and translation.
2. Details are reported in section 5.4 of the December 2023 TPG meeting report available on the IPP.
3. **Pest contamination vs contamination.** Based on a consultation comment, the TPG discussed the meaning of “pest contamination”. The definition of “contamination” in ISPM 5 implied the presence of a pest, making the preceding term “pest” redundant; however the term “pest contamination” could be retained if considered useful to convey to a wider audience the understanding of the CPM recommendation. The TPG recommended that, to avoid confusion, the CPM recommendation should clarify that “pest contamination” had the same meaning as the term “contamination” defined in ISPM 5.
4. **Plant pest vs pest.** The TPG recommended that the CPM recommendation also clarify that the term “plant pest” had the same meaning as the term “pest” defined in ISPM 5.

** Corresponding recommendation:** [**(8)**](#CpmRec8)

3. INDIVIDUAL TERMS AND DEFINITIONS AND AMENDMENTS TO THE GLOSSARY

3.1 Subjects removed from the TPG work programme in the *List of topics for IPPC standards*

1. The SC agreed to remove the subjects “visual examination” and “emerging pest” from the *List of topics for IPPC standards* in May 2023[[3]](#footnote-4) and November 2023[[4]](#footnote-5), respectively.

3.2 Draft 2023 amendments to ISPM 5

1. As no proposals for addition, revision or deletion of Glossary terms and definitions had been proposed, no draft 2023 amendments to ISPM 5 have been elaborated.

3.3 Terms to be considered by the SC for addition to the TPG work programme in the *List of topics for IPPC standards* as subjects

1. **Fumigation and irradiation.** The TPG pointed out that, while the definitions of “chemical pressure impregnation” and “heat treatment” referred to an official technical specification, the definitions of “fumigation” and “irrigation” did not and queried whether the latter two definitions needed rewording. For example, the definition of “irradiation” could be reworded as “the process in which a commodity isexposed to any type of ionizing radiation according to an official technical specification” while “fumigation” could be reworded as “the process in which a commodity isexposed to a chemical agent that reaches the commodity wholly or primarily in a gaseous state according to an official technical specification”. The TPG recommended the SC to add the two definitions to the TPG work programme to align them with the definitions of “chemical pressure impregnation” and “heat treatment”.
2. The secretariat informed the TPG that the EWG on the Revision of ISPM 26 (*Establishment of pest free areas for fruit flies* (Tephritidae)*)* had proposed that the TPG work on the term “pest free area”.
3. **Pest free area (PFA).** The EWG had suggested that the TPG review the definition to decide whether further explanation was required, particularly to make a distinction between declarations of “absence” and an “official PFA”.
4. **Treatment schedule.** The TPG considered whether to propose a revision of the definition of “treatment schedule” by replacing “intended outcome” with “required response” since the latter was a glossary term. The TPG members felt that “intended outcome” was a broader concept with a scientific connotation while “required response” was linked more to a legal context. Thus, the use of the term “required response” would make the term “treatment schedule” official – as “required response” referred to “treatment” which was a phytosanitary measure and therefore official – while retaining “intended outcome” would keep the definition more general. The secretariat suggested that the TPG recommend the SC to request the Technical Panel on Phytosanitary Treatments (TPPT) to consider the need to revise the definition of “treatment schedule” and, if recommended so by the TPPT, add the term to the TPG’s work programme.
5. **ePhyto**. At its January 2024 virtual meeting, the IPPC ePhyto[[5]](#footnote-6) Steering Group (ESG)[[6]](#footnote-7) discussed the definition of “ePhyto” as different words in the SIP document seem to be used for “ePhyto”. Indeed, the ISPM 5 provides the definition of “phytosanitary certificate” but does not define the term “ePhyto”. Thereforean “ePhyto” definition be added to the Glossary (09\_SC\_2024\_May).

** Corresponding recommendations:** [**(9)**](#IrrFum9)**,** [**(10)**](#PFA10)**,** [**(11)**](#Ephyo11) **and** [**(12)**](#TreatSch12)

4. CONSISTENCY IN THE USE OF TERMS

4.1 Proposed ink amendments to ISPM 5

1. The TPG discussed several editorial changes that could be addressed as ink amendments to ISPM 5.
2. The TPG recommended to the SC the ink amendments to the definitions of following terms (Appendix 1):

* “area of low pest prevalence”;
* “contaminating pest”;
* “corrective action plan (in an area)”;
* “debarked wood”;
* “host pest list”;
* “IPPC”; and
* “treatment schedule”.

1. The TPG also recommended that the term “plant protection organization (national)” should be deleted from the Glossary (Appendix 1).

** Corresponding recommendations:** [**(13)**](#InkAm13) **and** [**(14)**](#NPPO14)

4.2 Typographical change in ISPM 5

1. The TPG agreed that the term “treatment” should be presented in bold in all definitions in ISPM 5 and requested that the secretariat apply this typographical change.

** Corresponding recommendation:** [**(15)**](#Typochange15)

5. PUBLICATIONS ON PHYTOSANITARY TERMINOLOGY

5.1 Explanatory document on ISPM 5 (Annotated Glossary): 2024 version

1. The *Explanatory document on ISPM 5* (otherwise referred to as the “Annotated Glossary”) was reviewed by the TPG lead, Beatriz MELCHO (Uruguay) and by the TPG during its meeting in December 2023. The 2024 version of the *Explanatory document on ISPM 5* will be published on the IPP following the CPM-18.[[7]](#footnote-8)

** Corresponding recommendation:** [**(16)**](#AnnotatetGlsos16)

5.2 IPPC brochure “Introduction to international phytosanitary terminology”

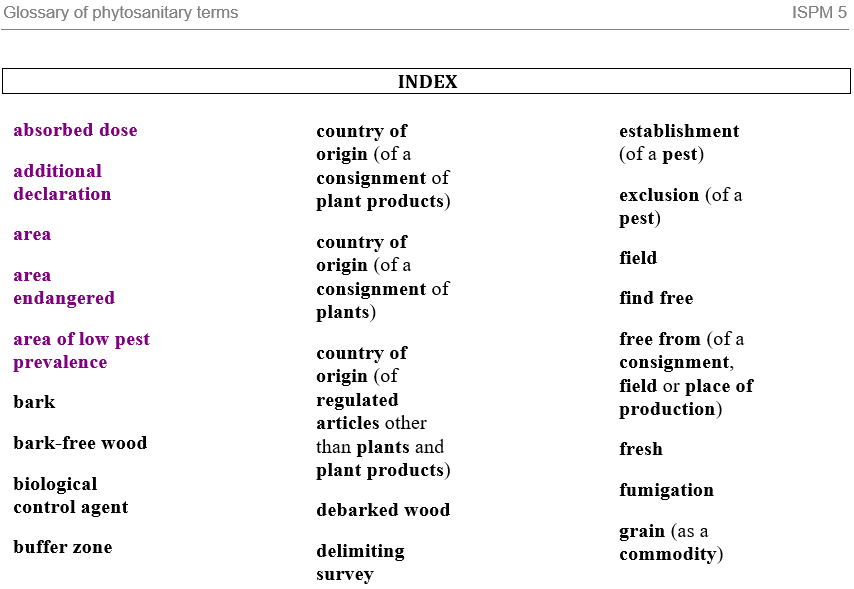
1. The IPPC brochure *Introduction to international phytosanitary terminology,* reviewed by the TPG in December 2022, was noted by the SC in May 2023.
2. The TPG further reviewed the brochure in December 2023 and proposed changes to improve clarity and consistency, reduce repetition, and provide a more logical text flow.
3. The secretariat confirmed that the brochure would be translated in all FAO languages, if funds are available.

** Corresponding recommendation:** [**(17)**](#brochure17)

6. OTHER PROPOSALS TO THE SC

6.1 Proposals to the SC to include an index in ISPM 5 and bold all the glossary terms in ISPMs

1. The TPG discussed two proposals originating from some IPPC regional workshops: incorporation of an index in ISPM 5 and applying bold to the glossary terms in all ISPMs.
2. Regarding the first proposal, the TPG recommended to incorporate it into ISPM 5 to facilitate the searching of terms. As shown in Figure 2, the index follows the alphabetical order of the Glossary and it is structured in three columns. Each term contains a hyperlink to the relative term and definition in the Glossary.
3. The TPG and the secretariat, considering the second proposal’s potential for significant and continuous workload, agreed to not proceed with applying bold to glossary terms in all ISPMs.

**Figure 2.** Proposal of an index to be included in ISPM 5.

** Corresponding recommendations:** [**(18)**](#indexISPM18) **and** [**(19)**](#boldingterms19)

6.2 Proposal to the SC to include “Noted” to the standard list of responses to consultation comments on draft amendments to ISPM 5

1. The TPG recommended the addition of the reply “Noted” to the response options when addressing consultation comments on draft amendments to ISPM 5. The secretariat clarified that such a decision fell within the purview of the SC.

** Corresponding recommendation:** [**(20)**](#noted20)

6.3 Proposal to the SC to consider the possibility for the TPG to review portions of text, other than terms and definitions, which were not subject of consultation comments

1. The TPG considered the fourth task of the Specification TP 5[[8]](#footnote-9):

Ensure that the correct terminology is used in ISPMs by:

- reviewing draft and adopted ISPMs in relation to new terms and definitions, member comments on terms, consistency within and between standards, and the initial translation of terms and their corresponding definitions (diagnostic protocols are excluded from this review)

- suggesting changes to the proposed terms and their corresponding definitions to the relevant steward or standard setting group (e.g. SC, other TP) prior to adoption.

and noted that the task seemed unclear about whether the TPG was allowed to review portions of text in draft ISPMs undergoing consultation, other than terms and definitions, which were not the subject of consultation comments.

** Corresponding recommendation:** [**(21)**](#tpgspec21)

7. SWOT ANALYSIS OF THE TPG

1. Following the initiative of the secretariat, the TPG identified several opportunities to improve the efficiency of and streamline the work and requested that the secretariat analyze the outcomes of the SWOT analysis andinformthe SC (12\_SC\_2024\_May).

8. TPG WORK PLAN 2024-2025

1. The TPG updated its work plan for 2024-2025 (Appendix 6 of the December 2023 TPG meeting report[[9]](#footnote-10)), providing an overview of the TPG tasks and related deadlines, as well as the status of current tasks.
2. Following the outcomes of the SWOT analysis, the TPG agreed to include in its work plan the task “Development of position papers, explanations, recommendations etc” in order to better reflect its work (e.g. the papers presented to the SC “Consistency issues with ISPM 23”[[10]](#footnote-11), “TPG work on consistency with ISPMs: achievements and status”[[11]](#footnote-12) and “Supplementary TPG paper on consistency recommendations on the draft revised PRA ISPMs for quarantine pests” (Appendix 2)), increasing transparency and awareness and contribute to the consistency of draft ISPMs during the development.
3. The next face-to-face TPG meeting is tentatively scheduled for 25-29 November 2024.
4. The TPG agreed that when the annual face-to-face TPG meeting is held outside of FAO premises, the panel would arrange a presentation (capacity-building) session for the host NPPO’s employees, demonstrating the work of the TPG.

** Corresponding recommendations:** [**(22)**](#workplan22) **and** [**(23)**](#capsesh23)

9. RECOMMENDATIONS TO THE SC

1. The SC is invited to:
2. *thank* Rajesh RAMARATHNAM for his contributions and commitment to the work of the TPG;
3. *agree* to issue a call for expert for English language for the TPG for a 5-year period beginning in 2025;
4. *thank* the NPPO of Brazil for hosting the meeting of the TPG;
5. *note* that the TPG comments on the draft *Reorganization and revision of pest risk analysis standards* (2020-001) were transmitted to the steward for consideration;
6. *consider* the supplementary paper (Appendix 2) drafted by the TPG and *agree* to forward the paper for consideration to the potential EWG on the holistic revision of the draft reorganized PRA standards;
7. *note* that the TPG comments on the draft annex *International movement of fresh* Mangifera indica *fruit* (2021-011) to ISPM 46 (*Commodity-based standards for phytosanitary measures*) were transmitted to the steward and SC-7 for consideration;
8. *note* that the TPG comments on the draft annex *Use of systems approaches in managing the pest risks associated with the movement of wood* (2015-004) to ISPM 39 (*International movement of wood*) were transmitted to the steward and SC-7 for consideration;
9. *note* that the TPG comments on the draft CPM Recommendation on *Sea containers* (R-06) were transmitted to the CPM Focus Group on Sea Containers for consideration;
10. *add* the terms “irradiation” and “fumigation” to the TPG’s work programme in the *List of topics for IPPC standards* as subjects;
11. *add* the term “pest free area” to the TPG’s work programme in the *List of topics for IPPC standards* as subject;
12. *add* the term “ePhyto” to the TPG’s work programme in the *List of topics for IPPC standards* as subject;
13. *request* the TPPT to consider the need for revision of the term “treatment schedule”.
14. *approve* the ink amendments to the definitions of “area of low pest prevalence”, “contaminating pest”, “corrective action plan (in an area)”, “debarked wood”, “host pest list”, “IPPC”, and “treatment schedule” (Appendix 1) and submit them to the CPM for noting;
15. *consider* the deletion of the term “plant protection organization (national)” from the Glossary (Appendix 1);
16. *note* the secretariat will apply the typographical change of the term “treatment” be presented in bold in all definitions in ISPM 5;
17. *review* and *approve* the 2024 version of the Explanatory document on ISPM 5 (Annotated Glossary);
18. *note* the IPPC brochure *Introduction to international phytosanitary terminology* will be published in 2024;
19. *consider* and *agree* to include an index in ISPM 5 (*Glossary of phytosanitary terms*);
20. *consider* and *agree* with the recommendation of the TPG and the secretariat not to proceed with applying bold to glossary terms in all ISPMs;
21. *consider* and *agree* to the request to include the option “noted” to the response options when addressing consultation comments on draft amendments to ISPM 5;
22. *confirm* that the TPG is allowed to review portions of text in draft ISPMs which were not the subject of consultation comments;
23. *note* the TPG work plan for 2024–2025 (Appendix 6 of the report of the TPG meeting in December 2023); and
24. *note* that when the annual face-to-face TPG meeting is held outside of FAO premises, the panel would arrange a presentation (capacity-building) session for the host NPPO’s employees, demonstrating the work of the TPG.

Appendix 1: Proposed ink amendments to ISPM 5

|  |  |  |  |
| --- | --- | --- | --- |
| **Location** | **Current text** | **Proposal for revised text**  [additions;~~deletions~~] | **Rationale** |
| **area of low pest prevalence** | An **area**, whether all of a country, part of a country, or all or parts of several countries, as identified by the competent authorities, in which a specific **pest** is present at low levels and which is subject to effective **surveillance** or **control** [IPPC, 1997; revised CPM, 2015] | An **area**, **~~whether all of a country, part of a country, or all or parts of several countries~~**, as **~~identified~~defined** by the competent authorities, in which a specific **pest** is present at low levels and which is subject to effective **surveillance** or **control** | To avoid redundancy. Deleted text is the current definition of “area”. “Identified” replaced by “defined” for consistency with the definition or “area” which is officially defined. |
| **contaminating pest** | A **pest** that is carried by a **commodity**, **packaging**, conveyance or container, or present in a storage place and that, in the case of **plants** and **plant** **products**, does not infest them [CEPM, 1996; revised CEPM, 1999; CPM, 2018] | A **pest** that is carried by a **commodity**, **packaging**, conveyance or container, or present in a storage place and that, in the case of **plants** and **plant products**, does not **infest** them | “infest” should be bolded |
| **corrective action plan** (in an **area**) | Documented plan of **phytosanitary** **actions** to be implemented in an **area** officially delimited for phytosanitary purposes if a pest is detected or a **tolerance level** is exceeded or in the case of faulty implementation of officially established procedures [CPM, 2009] | Documented plan of **phytosanitary actions** to be implemented in an **area officially** delimited for phytosanitary purposes if a **pest** is detected or a **tolerance level** is exceeded or in the case of faulty implementation of **officially** established procedures | “officially” should be bolded |
| **debarked wood** | **Wood** that has been subjected to any process that results in the removal of **bark**. (Debarked wood is not necessarily **bark-free wood**.) [CPM, 2008; replacing “debarking”] | **Wood** that has been subjected to any process that results in the removal of **bark**. (**Debarked wood** is not necessarily **bark-free wood**.) | “debarked wood” should be bolded |
| **host pest list** | A list of **pests** that infest a **plant** species, globally or in an **area** [CEPM, 1996; revised CEPM, 1999] | A list of **pests** that **infest** a **plant** species, globally or in an **area** | “infest” should be bolded |
| **IPPC** | **International Plant Protection Convention**, as deposited in 1951 with FAO in Rome and as subsequently amended [FAO, 1990; revised ICPM, 2001] | **International Plant Protection Convention~~, as deposited in 1951 with FAO in Rome and as subsequently amended~~** | There is no need to repeat the definition of the term. Consistency with other abbreviatures in the Glossary (See PRA, LMO, etc) |
| **~~plant protection organization (national)~~** | See **national plant protection organization** | ~~See~~ **~~national plant protection organization~~** | Delete, in the definition of national plant protection organization it is mentioned that formerly was plant protection organization (national). |
| **treatment schedule** | The critical parameters of a **treatment** which need to be met to achieve the intended outcome (i.e. the killing, **inactivation** or removal of **pests**, or rendering **pests** infertile, or **devitalization**) at a stated **efficacy** [ISPM 28, 2007] | The critical parameters of a **treatment** which need to be met to achieve the intended outcome (i.e. **~~the~~** killing, **inactivati~~on~~ng,** **~~or~~** remov**~~al~~**ing **~~of pests~~**, **~~or~~** rendering **~~pests~~** infertile**~~,~~** or **devitalizati~~on~~ng** regulated pests) at a stated **efficacy** | TPG agreed to the editorial changes to be in line with the definition of “treatment” in ISPM 5 |

Appendix 2: Supplementary TPG paper on consistency recommendations on the draft revised PRA ISPMs for quarantine pests

Introduction

1. Based on its December 2023 meeting in Brazil, the TPG has provided, to the steward of that draft and to the SC, its recommendations on terminology and consistency in the draft “Reorganization and revision of pest risk analysis standards: Pest risk analysis for quarantine pests” for 1st consultation, including its considerations on countries” comments.
2. TPG furthermore has identified certain major consistency issues, as outlined in this paper, that the Panel feels warrant particular consideration by the SC, the steward and other prospective forums that may deal with the draft. The issues dealt with here are:

* Theme 1: On the use of the terms “injury”, “consequence”, “effect” and similar terms
* Theme 2: On avoiding the use of the terms “direct effect” and “indirect effect”
* Theme 3: On the use of “environmental consequences” instead of “environmental risk”.

1. TPG suggests that the proposed changes, although quite numerous, are in fact each rather simple, being in most cases a matter of exchanging one word with another or deleting unnecessary words or sentences. The proposed changes do **not** change any substance or omit any information from the text, but only intend to provide consistency, thereby contributing to a “clear, simple and focused” ISPM.

Theme 1: On the use of the terms “injury”, “consequence”, “effect” and similar terms.

1. The terms “injury”, “(economic) consequence”, “effect”, “impact”, “economic importance” and “economic loss” are used frequently throughout the text. In some cases, the meaning is clear and consistent, but in other cases several terms are used synonymously for the same concept, or differing concepts are named by the same term. The inconsistency gives rise to confusion and makes the text unnecessarily difficult to read.
2. The noun “injury” for the effect of a pest to a plant may be understood as restricted to only physical damage and may therefore seem inadequate for describing some harmful effects, e.g. competition or hybridization by a plant as pest. However, the adjective “injurious” has a far wider meaning *not* restricted to physical damage; thus, the definition of “pest” is fully adequate for all types of pests. Similarly, the wider meaning (not restricted to physical damage) pertains to the verb “injure” and the noun “injuriousness”.
3. Striving for consistency to overcome confusion, TPG recommends the following general “rules” be applied for this text:

* Noting that “injurious” is the term used in the definition of a pest (whether being a plant, animal or pathogenic agent), use the adjective “**injurious**”, or the combined adjective + noun “**injurious effect**” to characterize ***the effect of a pest to a plant***; if relevant, also the verb “**injure**” or the noun “**injouriousness**” could be used. In some contexts, the verb “**affect**” (as in “pest affecting plants”) is simpler and more suitable.
* Noting that “economic consequences” is the term used in the definition of pest risk (and pest risk assessment) for quarantine pests, use “**economic consequences**” for ***the ramifications to economy, production, environment and the society at large****,* following the pest injury towards plants. As agreed and explained in Supplement 2 to ISPM 5, “economic consequences” in the IPPC context includes “**environmental consequences**” and “**social consequences**”, and those subcategorial terms may also be used in the text where specifically necessary. Furthermore, noting that “potential economic importance” is used in the definition of a quarantine pest, and “economically important loss” is used in the definition of endangered area, the phrasing “**potential economic importance**” or “**economically important loss**” may also be used where appropriate.
* In ***all other cases***, for ramifications or relations that are not covered by the above two categories, use the unspecific term “**effect**”.

1. TPG provides concrete text proposals to that effect in the Table below.

Theme 2: On avoiding the use of the terms “direct effect” and “indirect effect”

1. As a legacy from the core text of ISPM 11 of 2005, various “effects” (as used in a wide sense) of pests are currently categorized as being either “direct” or “indirect”. As explained above, TPG discourages the excessive use of the unspecific term “effect” for what in the context could more consistently be termed as either “injurious effect” or “economic consequence”. On top of that, TPG also suggests that the current use and distinction between “direct effects” and “indirect effects” (and likewise the phrasing “directly affecting” and “indirectly affecting”) is inconsistent, confusing, unnecessarily complex and in fact unnecessary for this standard on the PRA process.
2. In the text, “indirect effect” is used in (at least) four differing meanings as described below (A to D) with text examples:
3. **(A)** “Indirect effect” explained as **competition**: i.e, the effect of pests that “*...affect plants primarily by other processes such as competition. Examples includes most plants as pests...*” (quote of § 806). In contrast to this explanation, “direct effect” presumably is intended to mean pests affecting plants by infestation, although this is not explicit from the text.
4. The Convention’s definition of “pest” is: “*any species...of plant, animal or pathogenic agent injurious to plants...*”. Notably, the definition does not make any distinction between various modes of being injurious, whether by physical, chemical, genetical damage or competition. Neither does this or other definitions distinguish between “direct” or “indirect” effect.
5. TPG suggests that the Convention’s definition of a pest suffices and that the particular means by which plants as pest affect other plants is sufficiently and well explained (without any detour to “indirect effect”) in the draft Annex 6, § 988, as follows:

“Plants as pests may affect other plants through competition for space and resources, such as light, nutrients and water, or through parasitism or allelopathy. Plants introduced to a new area may also become pests by hybridizing with cultivated plants or wild plants.”

1. TPG therefore suggests that the type-A uses of “indirect effect” is confusing and unnecessary. TPG suggests that “direct/indirect effect” in all type-A cases be replaced with wording consistent with the definition of pest or with the draft Annex 6, § 988, and provides concrete text proposals to that effect in the Table below.
2. **(B)** “Indirect effect” explained as an **effect through an adverse effect on a beneficial organism:** i.e., the effect of pests that “*...primarily affect other organisms but thereby cause deleterious effects on plant species or on plant health in habitats or ecosystems. Examples include parasites of beneficial organisms, such as biological control agents*” (quote of § 807).
3. In these type-B cases, describing a (secondary) adverse effect to plants through a (primary) adverse effect on some intermediate, beneficial organism as being “indirect” is conceptually less problematic. Yet, the word “indirect” is still unnecessary, as the concept is well explained without using that word. TPG additionally notes, that adverse effects on organisms beneficial to plants is very seldomly considered a phytosanitary issue.
4. TPG suggests that the type-B uses of “indirect effect” be avoided throughout and provides concrete text proposals to that effect in the Table below.
5. **(C)** “Indirect effect” in the sense of “**economic consequences**”. In the following, long quote of §§ 532-545, “indirect effect” is unexplained and therefore quite obscure, but the description points to “factors” that are indeed relevant for evaluating “economic consequences”:

4.1.3 Indirect pest effects

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:

* + effects on domestic and export markets, including in particular effects on export-market access;
  + changes to producer costs or input demands, including control costs;
  + changes to domestic or foreign consumer demand for a product resulting from quality changes;
  + environmental and other undesired effects of control measures;
  + feasibility and cost of eradication or containment;
  + capacity to act as a vector for other pests;
  + resources needed for additional research and advice; and
  + social and other effects (e.g. on tourism).

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.

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.”

1. TPG suggests that the type-C uses of “indirect effect” for what are really “economic consequences” is highly inconsistent, confusing and unnecessary.TPG therefore suggests the type-C use of “indirect effect” be avoided throughout and replaced by “economic consequence” as appropriate. TPG provides concrete text proposals to that effect in the Table below.
2. **(D)** “Indirect effect” in the sense of “**environmental consequences**” (as a subset of “economic consequences”). In the following quote of §§ 819-824, “indirect effects” is unexplained and therefore quite obscure, but the description points to examples that are indeed relevant for evaluating “environmental consequences” (and thereby “economic consequences”):

“In the case of the analysis of environmental risks, examples of **indirect pest** effects on plants or their environmental consequences that may be considered include:

* + significant effects on plant communities;
  + significant effects on designated environmentally sensitive or protected areas;
  + 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);
  + effects on human use of plant communities and the environment (e.g. effects on water quality, recreational uses, tourism, animal grazing, hunting, fishing); and
  + costs of environmental restoration.”

1. TPG suggests that the type-D uses of “indirect effect” for what are really “environmental consequences” (as a subset of “economic consequences”) is highly inconsistent, confusing and unnecessary.TPG therefore suggests the type-D use of “indirect effect” be avoided throughout and replaced by “environmental consequences” as appropriate. TPG provides concrete text proposals to that effect in the Table below.

Theme 3: On the use of “environmental consequences” instead of “environmental risk”

1. The term “Environmental risk” is used in various parts of the draft standard, in particular in the draft Annex 4 bearing that name.
2. TPG suggests the use of that term is inconsistent and imprecise, blurring the facts that IPPC is concerned with “pest risk” and that this draft standard deals with “pest risk analysis”. As CPM has recognized that “economic consequences” includes “environmental consequences”, it is obviously pertinent that this PRA standard elaborates on how to evaluate possible environmental consequences as part of the pest risk assessment. However, this is a differing issue than an “environmental risk assessment” typically carried out by other authorities than an NPPO. TPG therefore suggests that “environmental risk” be replaced by “environmental consequences” throughout the text.
3. TPG provides concrete text proposals to that effect in the Table below.

**Table 1: Proposals for amended text in regard to Themes 1, 2 and 3**

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| --- | --- | --- |
| **§** | **Proposed text amendment** | **Theme. Further note** |
| 76 | 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, being injurious ~~causing injury~~ to plants or plant products. Such risks may also be analysed using the PRA process. | Theme 1. |
| 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~~ consequences, LMOs and plants as pests is given in Annexes 4, 5 and 6, respectively. | Theme 3 |
| 128 | biological attributes of the organism and evidence of ability to be injurious ~~cause injury~~; | Theme 1. |
| 133 | - evidence of economic consequences ~~impact~~, which includes environmental consequences ~~impact~~; | Theme 1. |
| 171 | The range of pests covered by the IPPC extends beyond pests ~~directly~~ affecting cultivated plants~~. Pests may also~~ and include pests ~~indirectly affecting cultivated plants, pests~~ affecting non-cultivated plants, LMOs as pests~~,~~ and plants as pests. | Theme 2.  Furthermore, the qualifier ‘as pests’ added to LMO. |
| 173  + 174 | 3.1 Environmental consequences ~~risks~~  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 consequences ~~risks~~ is provided in Annex 4. | Themes 2 and 3. |
| 206 | At this stage, information is necessary to identify the organism and its potential economic consequences ~~impact~~, which includes environmental consequences ~~impact~~. 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. | Theme 1. |
| 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 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.~~ | Theme 2.  As a legacy of the core ISPM 11 text of 2003, this paragraph was written long before the Annex on PRA for Plants as Quarantine Pests (now draft Annex 6) was created and adopted in 2013.  The TPG recommends the entire paragraph be deleted because it is obsolete and redundant, and the fundamental issues on PRA for plants as quarantine pests are clearly and sufficiently described in the draft Annex 6, Section 2. There, wordings like ‘direct/indirect’, ‘weed’, ‘non-indigenous plants’ had been consciously avoided by 2013. |
| 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 be injurious ~~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. | Theme 1. |
| 287 | presence detected in connection with observations of injurious effects ~~injury~~ to plants or to beneficial organisms before any clear causal link has been established; | Theme 1. |
| 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 injurious effects ~~injury~~ to non-target organisms. Other concerns may include: | Theme 1. |
| 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~~ consequences should relate only to the defined PRA area | Theme 1 |
| 351 | has the potential to be injurious ~~cause injury~~ to plants or plant products in the PRA area; and | Theme 1. |
| 388 | There should be clear indications that the pest is likely to have ~~an~~ unacceptable economic consequences ~~impact~~ in the PRA area. | Theme 1. |
| 390 | Unacceptable economic consequences ~~impact~~ is described in Supplement 2 (Guidelines on the understanding of “potential economic importance” and related terms including reference to environmental considerations) to ISPM 5. | Theme 1. |
| 496 | 4. Assessment of potential economic consequences | Theme 1.  TPG believes that the entire section 4 contains much repetitive and inconsistent text, where e.g. terms like ‘effect’, ‘consequence’, ‘importance’ have been used inconsistently.  In the following (§§ 497-569), TPG provides some text proposals, but more generally would recommend a major overhaul of section 4 with a view to seeking consistency and simplification; the number of subsections could probably be reduced and be given more appropriate headings. |
| 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 consequences ~~effects~~” provides a framework in which a wide variety of consequences ~~effects~~ (including environmental and social consequences ~~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~~ “Potential economic importance” and related terms are described in Supplement 2 to ISPM 5. | Theme 1.  TPG acknowledges that this (new) text had been copied (with modifications) from ISPM 5, Suppl. 2, Sect. 4.1.  However, for consistency TPG recommends that ‘economic effects’ as yet another synonym should be avoided and replaced by ‘economic consequences’.  In the last sentence, the phrasing “Potential economic importance” refers to the actual title of ISPM 5/Suppl 2. |
| 499 | ~~4.1 Consequences~~ | Theme 1.  Subsection seems inconsistent and unnecessary. |
| 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 of the pest. 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. | Theme 1.  ‘Effects’ used as a synonym of ‘potential economic consequences’ is inconsistent and the phrasing unnecessary.  . |
| 507 | ~~4.1.1 Pest effects~~ | Theme 1.  Subsection seems inconsistent and unnecessary. |
| 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~~. | Theme 2.  The use of ‘effect’ here is inconsistent, and ‘direct or indirect’ inconsistent and obscure; for the following §§, TPG suggests using ‘injurious effects to plants’, and ‘consequences’, respectively.  However, TPG also suggests it be considered whether the splitting into those subsections is really meaningful, logic and necessary. |
| 515 | The environmental ~~effects and~~ consequences considered should be those that result from the injourious effect 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 slightly affects ~~a minor~~ ~~impact on~~ other plants may be significantly allergenic ~~for~~ to 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. | Themes 1 & 2 & 3.  ‘Environmental effects’ is inconsistent and unnecessary, and ‘environmental consequences’ suffices.  ‘Impact’ may be confused with ‘economically unacceptable impact’ as used in the definition of pest risk of RNQPs. TPG recommends this be avoided by using instead the verb ‘affect’ as in ‘pest that affect’ (consistent with several other text cases, e.g. §§ 512 and 514). |
| 517 | 4.1~~.2~~ ~~Direct pest effects~~ Injurious effects on plants | Theme 1 & 2.  Furthermore, TPG suggests it may be considered whether the splitting of information into the subsections (in the draft numbered as 4.1.2 and 4.1.3) is really meaningful, logic and necessary. |
| 518 | For identification and characterization of the ~~direct~~ injurious 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: | Theme 1 & 2.  Furthermore, the sub-sentence ‘or those effects that are host-specific’ is obscure, and TPG suggests it be deleted. |
| 529 | -environmental ~~effects~~ consequences | Theme 1 |
| 532 | 4.2 ~~1.3 Indirect pest effects~~ Economic consequences | Theme 1 & 2.  Furthermore, TPG suggests it may be considered whether the splitting of information into the subsections (in the draft numbered as 4.1.2 and 4.1.3) is really meaningful, logic and necessary. |
| 533 | For identification and characterization of the ~~indirect effects~~ consequences 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: | Theme 1 & 2.  Furthermore, the sub-sentence ‘or those effects that are not host-specific’ is obscure, and TPG suggests it be deleted. |
| 538 | -environmental and other undesired ~~effects~~ economic consequences of control measures | Theme 1 |
| 542 | social and other ~~effects~~ consequences (e.g. on tourism). | Theme 1. |
| 548 | Some of the ~~direct and indirect effects~~ consequences of the introduction of a pest determined in section 4.1~~.2~~ and section 4.2 ~~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~~ consequences may not be adequately measured in terms of prices in established product or service markets. Examples include, in particular, environmental ~~effects~~ consequences (such as ecosystem stability, biodiversity) and social ~~effects~~ consequences (such as mental well-being or spiritual, religious and cultural connections) arising from a pest introduction. These ~~impacts~~ consequences may be approximated with an appropriate non-market valuation method. More details on environmental ~~effects~~ consequences are given below. | Theme 1 & 2. |
| 559 | As determined above, ~~most of the direct effects of a pest, and~~ some of the ~~indirect effects,~~ consequences will be of a commercial nature or have ~~consequences~~ effects 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: | Theme 1 & 2. |
| 566 | *Partial budgeting.* This may be used if the economic ~~effects~~ consequences, induced by the action of the pest, are generally limited to producers and are considered relatively minor. | Theme 1. |
| 567 | *Partial equilibrium.* This may be used if, under section 4.2.2, there is a significant change in producer profits, or if there is a significant change in consumer demand. Partial equilibrium analysis is necessary to measure welfare changes, or the net changes arising from the pest ~~impacts~~ consequences on producers and consumers | Theme 1. |
| 568 | *General equilibrium.* If the economic changes are significant to a national economy, and could cause changes to factors such as wages, interest rates or exchange rates, then general equilibrium analysis may be used to establish the full range of economic ~~effects~~ consequences. | Theme 1. |
| 569 | The use of analytical techniques is often limited by lack of data, by uncertainties in the data, and by the fact that for certain economic consequences ~~effects~~ only qualitative information can be provided. | Theme 1. |
| 801 | ANNEX 4; Environmental ~~risks~~ consequences | Theme 3 |
| 804 | [Complete deletion recommended]  [If not entirely deleted, then alternative wording recommended:]  ~~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 injurious to ~~that have indirect effects on~~ plants through effects on other organisms, and the convention applies not only to the protection of cultivated plants, but also to wild flora. Thus, the scope of the IPPC also extends to organisms that are pests because they fall into one or more of the following categories: | Theme 2.  TPG notes that messages on the wide scope of IPPC has been made quite clear already in §§ 77, 82, 86, 171, 174, 181 and 512-514. Therefore, §§ 804-807 are in fact redundant and overly complicated.  Furthermore, TPG queries the rationale for placing §§ 806-807 (and thereby also the last sentence of § 804) under this section of Environmental consequences of pest risk, because: Plants as pests, as well as pests affecting plants through effects on other organisms, are not only relevant to the environment (wild flora), but may be just as relevant with cultivated plants.  TPG therefore recommends to *completely delete* the entire block of §§ 804-807.  In case such deletion is not deemed feasible, TPG provides recommendation for amended texts for those §§ 804-807, and recommend the substance of this text be transferred to the Background Section (or another generic section) |
| 805 | [Complete deletion recommended]  [If not entirely deleted, then alternative wording recommended:]  *They ~~directly~~ affect uncultivated or unmanaged plants*. 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~~ *~~Ophiostoma novo-ulmi~~* ~~Brasier, 1991).~~ | TPG recommends to *completely delete* §§ 804-807, see § 804. If not deemed feasible, amended text is provided here.  Theme 2.  Furthermore, providing an example of a pest is inconsistent with other not pest-specific standards and the general SC decision to avoid such examples. |
| 806 | [Complete deletion recommended]  [If not entirely deleted, then alternative wording recommended:]  *They ~~indirectly affect plants~~*~~. In addition to pests that directly affect host plants, there are those that~~ affect plants ~~primarily~~ by ~~other processes such as~~ competition or allelopathy, i.e. they are non-parasitic ~~. Examples include most~~ plants as pests ~~(e.g. weeds, non-indigenous plants that establish or spread rapidly)~~. | TPG recommends to *completely delete* §§ 804-807, see § 804. If not deemed feasible, amended text is provided here.  Theme 2.  The proposed amendment by TPG is consistent with draft Annex 6, Sect. 2 (§988), the text of which was adopted in 2013. |
| 807 | [Complete deletion recommended]  [If not entirely deleted, then alternative wording recommended:]  *They ~~indirectly~~ affect plants through effects on other organisms*. Some pests may primarily affect other organisms but thereby cause deleterious effects on plant species or on plant health in habitats or ecosystems. Examples include parasites of beneficial organisms, such as biological control agents. | TPG recommends to *completely delete* §§ 804-807, see § 804. If not deemed feasible, amended text is provided here.  Theme 2. |
| 808 | To protect the environment and biodiversity without creating disguised barriers to trade, environmental consequences ~~risks~~, including for ~~risks to~~ biological diversity, should be analysed in a PRA. | Theme 3. |
| 810 | For environmental consequences ~~risks~~, the variety of sources of information will generally be wider than traditionally used by NPPOs. Broader inputs may be required. These sources may include environmental impact assessments, but it should be recognized that such assessments usually do not have the same purpose as PRA and cannot substitute for PRA. | Theme 3. |
| 812 | Official control of pests with ~~posing an~~ environmental consequences ~~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. | Theme 3. |
| 813 | **4. Environmental consequences ~~of pest effects~~** | Theme 1, and for simplification. |
| 814 | In the case of the analysis of environmental consequences ~~risks~~, examples ~~of~~ **~~direct pest~~** ~~effects on injury to plants or their environmental consequences~~ that may be considered include: | Themes 2 & 3, and for simplification |
| 819 | ~~In the case of the analysis of environmental risks, examples of~~ **~~indirect pest~~** ~~effects on plants or their environmental consequences that may be considered include:~~ | Theme 2 (& 3).  The distinction between ‘direct’ and ‘indirect’ is unnecessary, and similarly the conceptual difference between §§ 815-817 and §§ 820-824 seems obscure, so § 819 is confusing and unnecessary. |
| 827 | In considering the management of environmental ~~risks~~ consequences, NPPOs should recognize that phytosanitary measures are intended to account for uncertainty and should be designed in proportion to the pest risk. Pest risk management options should be identified, taking account of the degree of uncertainty in the assessment of economic consequences, probability of introduction, and the respective technical justification of those options. In this respect, the management of ~~risks to the environment~~ environmental consequences ~~caused by pests~~ does not differ from the management of other pest risk. | Theme 3, and for simplification. |
| 869 | changes that have effects of phytosanitary concern on other organisms, such as biological control agents, beneficial organisms, soil fauna and microflora, or nitrogen-fixing bacteria~~, that result in a phytosanitary impact (indirect effects)~~. | Theme 1 and 2, and for simplification. |
| 871 | negative ~~direct or indirect~~ effects of plant-produced pesticides on non-target organisms beneficial to plants; | Theme 2. |
| 907 | In order to be categorized as a pest, an LMO has to be injurious or potentially injurious to plants or plant products under conditions in the PRA area. ~~This damage may be in the form of direct effects on plants or plant products, or indirect effects.~~ For guidance on the process of determining whether an LMO has the potential to be a pest, see section 2 of this annex. | Theme 2. |
| 935 | The economic ~~impact~~ consequences (including environmental ~~impact~~ consequences) should relate to the pest nature (injurious to plants and plant products) of the LMO. | Theme 1. |
| 954 | The consequences ~~impact~~ being assessed should relate to the pest nature (injurious to plants and plant products) of the LMO. | Theme 1. |
| 1024 | ~~With respect to a plant being assessed as a pest with indirect effects, wherever a reference is made to a “host” or “host range”, these terms should be understood to refer to a suitable habitat in the PRA area.~~ | This sentence (a legacy from ISPM 11, Sect. 2.2, § 4) is obsolete, confusing and unnecessary. TPG recommends it be deleted.  The following § 1025 had been introduced into the Annex on plants as quarantine pests and adopted as a comprehensive explanation of the conceptual relation between ‘host’ and ‘habitat’. Furthermore, sections 4.7 and 4.8 of the draft Annex 6 provides comprehensive guidance on establishment and spread issues. |

1. TPG meeting reports: [www.ippc.int/en/commission/standards-committee/technical-panels/technical-panel-glossary-phytosanitary-terms-ispm-5/](https://www.ippc.int/en/commission/standards-committee/technical-panels/technical-panel-glossary-phytosanitary-terms-ispm-5/) [↑](#footnote-ref-2)
2. TPG December 2023 meeting report: [www.ippc.int/en/publications/93122/](https://www.ippc.int/en/publications/93122/) [↑](#footnote-ref-3)
3. SC May 2023 meeting report: [www.ippc.int/en/publications/92494/](https://www.ippc.int/en/publications/92494/) [↑](#footnote-ref-4)
4. SC November 2023 meeting report [www.ippc.int/en/publications/92995/](https://www.ippc.int/en/publications/92995/) [↑](#footnote-ref-5)
5. IPPC ePhyto Solution: [www.ippc.int/en/ephyto/](https://www.ippc.int/en/ephyto/) [↑](#footnote-ref-6)
6. ePhyto Steering Group: [www.ippc.int/en/ephyto/ephyto-steering-group/](http://www.ippc.int/en/ephyto/ephyto-steering-group/) [↑](#footnote-ref-7)
7. Explanatory document on ISPM 5: [www.ippc.int/en/publications/87049/](https://www.ippc.int/en/publications/87049/) [↑](#footnote-ref-8)
8. Specification TP 5: [www.ippc.int/en/publications/1300](https://www.ippc.int/en/publications/1300) [↑](#footnote-ref-9)
9. TPG December 2023 meeting report: [www.ippc.int/en/publications/93122/](https://www.ippc.int/en/publications/93122/) [↑](#footnote-ref-10)
10. 13\_SC\_2023\_May [↑](#footnote-ref-11)
11. 14\_SC\_2023\_May, Appendix 1 [↑](#footnote-ref-12)