

2024 FIRST CONSULTATION 1 July – 30 September 2024

Compiled comments for Draft specification on revision of the draft reorganized pest risk analysis ISPM (2023-037) - English

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S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged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> (200) Costa Rica (30 Sep 2024 11:26 PM) Comments from the Latin American Workshop and OIRSA are supported.
G	(General Comment)	C	<i>Category : EDITORIAL</i> (197) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:22 PM) Jamaica fully supports the proposed the revision and reorganization of this ISPM.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (196) Belarus (30 Sep 2024 3:03 PM) The Republic of Belarus would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (195) Antigua and Barbuda (30 Sep 2024 2:27 PM) Antigua and Barbuda endorses the comments as agreed to by the CAHFSA workgroup at the 2024 Regional IPPC Workshop for the Caribbean
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (194) Guyana (30 Sep 2024 2:06 PM) Guyana endorses the comments submitted by CAHFSA.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (186) Barbados (30 Sep 2024 11:46 AM) Barbados endorses the comments made by CAHFSA.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (182) Korea, Republic of (30 Sep 2024 6:22 AM) Korea supports the comments made by APPPC.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (181) Peru (29 Sep 2024 6:13 PM) Peru supports the comments made by COSAVE
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (159) European Union (29 Sep 2024 2:05 PM) We would like to draw attention on the fact that, in the previous consultation, not all the parts of the reorganized ISPM were open to comments. However, numerous contracting parties decided to comment on them but not all. Therefore, the steward does not have a correct overview of all contracting parties opinion. We want to highlight that this reorganized ISPM is of high importance and that we should take the time to write it correctly. The end result has to be of good quality, even if this implicates lots of comments, discussions and works.

G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (158) European Union (29 Sep 2024 2:04 PM) We note that the European Union's initial position of proceeding with only a minimal revision of the existing standards has been overtaken by the decision to proceed with a much broader revision. We note with disappointment that this change in the review process greatly lengthens the time for approval of the standard on pest risk management that was almost ready for approval. The revision of the risk management aspects was the real priority and specific work were carried out on it.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (157) European Union (29 Sep 2024 2:03 PM) It is still not clear how the structure of the draft reorganized pest risk analysis standard will be. The EWG should also reflect on this point and only change if there are good reasons to do so.</p> <p>It should now be clear that the revision will focus also on the improvement of the methodology based on experiences and new knowledge following the last revisions, and that it will improve the standard from a scientific point of view.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (156) European Union (29 Sep 2024 2:02 PM) The European Union is not in favour of moving significant amount of material to implementation guidance. This could weaken the standards as they currently are.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (155) European Union (29 Sep 2024 2:02 PM) Paragraph 28 states that the draft reorganized ISPM includes a combination of requirements and detailed guidance on the process of conducting a PRA that may be challenging for countries to read, understand and implement. The European Union supports keeping this combination together because it is not sure that countries will have problems in understanding and implementing the reorganized ISPM. It would be appropriate to have a better understanding on this before undertaking the onerous task of separating requirements and detailed guidance.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (154) European Union (29 Sep 2024 2:02 PM) The first proposed task of the EWG (paragraph 37) is to review existing standards and guidelines for risk analysis developed by other standard setting organizations. The European Union believes that for the EWG this task is not necessary and useful, considering that the Codex alimentarius and Animal health standards are very different from ISPMs.</p> <p>This exercise is of broader interest than the EWG and should rather be carried out by the SC and the SPG to consider the implications for the IPPC work in broader sense. If needed, the SC and SPG can propose changes based on this exercise. Task 1 should not be carried out by the EWG.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (151) China (29 Sep 2024 4:25 AM)</p>

			China supports this drafting note but has two main suggestions: first, ISPM 21 should be included in the revision; second, the number of working group members should be increased to 7-9.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (143) Nigeria (28 Sep 2024 1:58 AM) NO COMMENTS.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (142) Germany (28 Sep 2024 12:31 AM) Germany would like to formally endorse the EPPC comments submitted via the IPPC Online Comment System.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (141) Chile (27 Sep 2024 4:18 PM) Chile in agreement and support of the comments made by COSAVE
G	(General Comment)	C	<i>Category : EDITORIAL</i> (132) Brazil (24 Sep 2024 5:38 PM) Brazil supports the comments made by COSAVE
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (130) United Kingdom (24 Sep 2024 4:48 PM) The UK would like to formally endorse the EPPC comments submitted via the IPPC Online Comment System. EPPC have submitted these comments on behalf of the UK and as such they should be considered as UK national comments.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (129) Switzerland (24 Sep 2024 12:20 PM) Switzerland would like to formally endorse the EPPC comments submitted via the IPPC Online Comment System
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (92) APPPC (6 Sep 2024 7:01 AM) 1. APPPC recommends virtual pre-meetings including consideration of the required period of the EWG physical meeting. 2. APPPC recommends to increase the size of the EWG to 7-9. Thailand (24 Sep 2024 4:51 AM) Thailand agrees with the APPPC comments.
G	(General Comment)	C	<i>Category : TECHNICAL</i> (122) Uruguay (21 Sep 2024 1:28 PM) Uruguay agrees with COSAVE comments
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (119) EPPC (13 Sep 2024 2:52 PM) The first proposed task of the EWG (paragraph 37) is to review existing standards and guidelines for risk analysis developed by other standard setting organizations. EPPC believes that for the EWG this task is not necessary and useful, considering that the Codex alimentarius and Animal health standards are very different from ISPMs. This exercise is of broader interest than the EWG and should rather be carried out by the SC and the SPG to consider the implications for the IPPC work in

			broader sense. If needed, the SC and SPG can propose changes based on this exercise. Task 1 should not be carried out by the EWG.
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (118) Eppo (13 Sep 2024 2:52 PM) Paragraph 28 states that the draft reorganized ISPM includes a combination of requirements and detailed guidance on the process of conducting a PRA that may be challenging for countries to read, understand and implement. Eppo supports keeping this combination together because it is not sure that countries will have problems in understanding and implementing the reorganized ISPM. It would be appropriate to have a better understanding on this before undertaking the onerous task of separating requirements and detailed guidance.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (117) Eppo (13 Sep 2024 2:52 PM) Eppo is not in favour of moving significant amount of material to implementation guidance. This could weaken the standards as they currently are.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (116) Eppo (13 Sep 2024 2:52 PM) It is still not clear how the structure of the draft reorganized pest risk analysis standard will be. The EWG should also reflect on this point and only change if there are good reasons to do so.</p> <p>It should now be clear that the revision will focus also on the improvement of the methodology based on experiences and new knowledge following the last revisions, and that it will improve the standard from a scientific point of view.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (115) Eppo (13 Sep 2024 2:52 PM) We note that Eppo's initial position of proceeding with only a minimal revision of the existing standards has been overtaken by the decision to proceed with a much broader revision. We note with disappointment that this change in the review process greatly lengthens the time for approval of the standard on pest risk management that was almost ready for approval. The revision of the risk management aspects was the real priority and specific work were carried out on it.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (114) Eppo (13 Sep 2024 2:52 PM) We would like to draw attention on the fact that, in the previous consultation, not all the parts of the reorganized ISPM were open to comments. However, numerous contracting parties decided to comment on them but not all. Therefore, the steward does not have a correct overview of all contracting parties opinion.</p> <p>We want to highlight that this reorganized ISPM is of high importance and that we should take the time to write it correctly. The end result has to be of good quality, even if this implicates lots of comments, discussions and works.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (91) Caribbean Agricultural Health and Food Safety Agency (4 Sep</p>

			2024 4:35 PM) The CAHFSA region supports the reorganization of the ISPMs and have no objection to the draft specification
G	(General Comment)	C	<i>Category : EDITORIAL</i> (61) Sri Lanka (22 Aug 2024 9:58 AM) All places of the document it is better to capitalized initial letter of main words having shorten forms in Capital letters Eg: National Plant Protection Organization, Pest Risk Analysis, Expert Working Groups etc. NPPO Sri Lanka agreed with these specifications
G	(General Comment)	C	<i>Category : EDITORIAL</i> (52) South Africa (20 Aug 2024 2:16 PM) The NPPO of SA agrees with this specification
1	DRAFT SPECIFICATION FOR ISPM: Revision of the draft reorganized pest risk analysis ISPM (2023-037)	C	<i>Category : SUBSTANTIVE</i> (198) Russian Federation (30 Sep 2024 5:07 PM) 'General comment': "The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System"
1	DRAFT SPECIFICATION FOR ISPM: Revision of the draft reorganized pest risk analysis ISPM (2023-037)	C	<i>Category : SUBSTANTIVE</i> (187) Australia (30 Sep 2024 12:23 PM) Australia supports the comments and edits of the PPPO. Australia supports the continued revision of the current draft revised PRA standards. The previous EWG did a great job in reviewing and reorganising the vast amounts of information given the constraints of their Specification and the time provided to them. Australia considers that, give the fundamental importance of PRA for the successful implementation of the IPPC and facilitation of safe and least restrictive trade, this review and the EWG conducting it for the IPPC Community needs to be afforded sufficient time to do this task. Australia proposes that this EWG meet through the following mechanisms to allow this. Virtual pre-meetings where discussion papers are presented (several weeks prior to meeting in person) Two weeks of in-person meetings (either together or with some months gap between two separate weeks) to allow sufficient group and individual drafting and consideration time.
1	DRAFT SPECIFICATION FOR ISPM: Revision of the draft reorganized pest risk analysis ISPM (2023-037)	C	<i>Category : SUBSTANTIVE</i> (153) Malawi (29 Sep 2024 11:01 AM) We support the Specification for ISPM
1	DRAFT SPECIFICATION FOR ISPM: Revision of the draft reorganized pest risk analysis ISPM (2023-037)	C	<i>Category : SUBSTANTIVE</i> (140) Myanmar (27 Sep 2024 9:45 AM) NPPO, Myanmar supports Draft Specification for ISPM,
1	DRAFT SPECIFICATION FOR ISPM: Revision of the draft reorganized pest risk analysis ISPM (2023-037)	C	<i>Category : SUBSTANTIVE</i> (85) Nepal (4 Sep 2024 3:17 AM)

	risk analysis ISPM (2023-037)		Inclusion of revision matter of ISPM 21 needs to be also considered in consistent to the changes proposed.
1	DRAFT SPECIFICATION FOR ISPM: Revision of the draft reorganized pest risk analysis ISPM (2023-037) PROYECTO DE ESPECIFICACIÓN PARA LA NIMF: Revisión del proyecto de análisis de riesgo de plagas reorganizado NIMF (2023-037)	P	<i>Category : EDITORIAL</i> (71) Honduras (1 Sep 2024 5:22 PM)
1	DRAFT SPECIFICATION FOR ISPM: Revision of the draft reorganized pest risk analysis ISPM (2023-037)	C	<i>Category : SUBSTANTIVE</i> Congo, DR (62) IPPC Regional Workshop Africa (22 Aug 2024 10:13 AM) We support Draft Specification for for ISPM: Revision of the draft reorganized pest risk analysis
2	Status box Cuadro de estado	P	<i>Category : EDITORIAL</i> (72) Honduras (1 Sep 2024 5:26 PM) Proyecto de Especificacion para las NIMFs Analisis de Riesgo de Plagas reorganizada NIMF (2023-037)
14	2024-05 SC revised draft <u>draft</u> specification and approved for first consultation.	P	<i>Category : EDITORIAL</i> (10) New Zealand (8 Aug 2024 6:06 AM) typo
24	Reason for the revision of the draft reorganized standard	C	<i>Category : SUBSTANTIVE</i> (63) IPPC Regional Workshop Africa (22 Aug 2024 10:13 AM) No comments
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a specified PRA area.	C	<i>Category : EDITORIAL</i> (185) Bangladesh (30 Sep 2024 9:13 AM) National Plant Protection Organizations
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated <u>quarantine</u> pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of <u>these</u> pests in a specified PRA area.	P	<i>Category : SUBSTANTIVE</i> (160) European Union (29 Sep 2024 2:07 PM) The purpose is to determine whether a pest can be categorised as a quarantine pest. RNQP are not under the scope of this pest risk analysis.
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs) (NPPOs) which allows the identification of management measure options to mitigate the risk of introduction of pests identified as associated with the import pathway . It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a	P	<i>Category : SUBSTANTIVE</i> (144) Mexico (28 Sep 2024 6:31 PM) To complete the idea

	specified PRA area.		
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and of spread of pests and establishment in a specified PRA area.	P	<i>Category : TECHNICAL</i> (136) Kenya (25 Sep 2024 2:06 PM) and establishment
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a specified PRA area.	P	<i>Category : TECHNICAL</i> (135) Kenya (25 Sep 2024 2:02 PM) evaluate the probability of introduction of pests,
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated-quarantine pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of these pests in a specified PRA area.	P	<i>Category : SUBSTANTIVE</i> (93) EPP0 (13 Sep 2024 2:52 PM) The purpose is to determine whether a pest can be categorised as a quarantine pest. RNQP are not under the scope of this pest risk analysis.
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a specified PRA area. <u>El análisis de riesgo de plagas (ARP) es un proceso fundamental en el ámbito de aplicación de la CIPF y una importante herramienta de evaluación basada en la ciencia para las organizaciones nacionales de protección fitosanitaria (ONPF). Se utiliza para identificar plagas y vías de introducción preocupantes, determinar si las plagas reúnen los requisitos para ser consideradas plagas reglamentadas e identificar las opciones de medidas fitosanitarias que sean adecuadas para gestionar el riesgo de introducción y propagación de plagas en una zona de ARP específica.</u>	P	<i>Category : SUBSTANTIVE</i> (73) Honduras (1 Sep 2024 5:32 PM) Estamos de acuerdo con este motivo de revision de norma
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a	C	<i>Category : EDITORIAL</i> (69) Bangladesh (28 Aug 2024 11:05 AM) area/areas

	specified PRA area.		
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a specified PRA area.	C	Category : EDITORIAL (68) Bangladesh (28 Aug 2024 11:04 AM) National Plant Protection Organizations
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a specified PRA area.	C	Category : EDITORIAL (66) Bangladesh (28 Aug 2024 11:00 AM) Risk Analysis
25	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to identify pests and pathways of concern, determine whether pests qualify as regulated pests, and identify the options for phytosanitary measures that are appropriate to manage the risk of introduction and spread of pests in a specified PRA area.	C	Category : EDITORIAL (51) South Africa (20 Aug 2024 2:15 PM) Proposal to capitalize these words for consistency
26	In 2022, the expert working group (EWG) on <i>Reorganization and revision of pest risk analysis standards</i> (2020-001) reorganized the ISPMs related to PRA – ISPM 2 (<i>Framework for pest risk analysis</i>), ISPM 11 (<i>Pest risk analysis for quarantine pests</i>) and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) – into one draft overarching ISPM with annexes for each stage of PRA. The reorganization removed redundancy in the text without substantial modifications. The draft reorganized ISPM was reviewed by the Standards Committee (SC) and submitted to first consultation in 2023. However, general comments submitted during the consultation supported a full, comprehensive revision of the reorganized ISPM. The reasons supporting a comprehensive revision were as follows:	C	Category : EDITORIAL (67) Bangladesh (28 Aug 2024 11:03 AM) Expert Working Group
26	In 2022, the expert working group (EWG) on <i>Reorganization and revision of pest risk analysis standards</i> (2020-001) reorganized the ISPMs related to PRA – ISPM 2 (<i>Framework for pest risk analysis</i>), ISPM 11 (<i>Pest risk analysis for quarantine pests</i>) and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) – into one draft overarching ISPM with annexes for each stage of PRA. The reorganization removed redundancy in the text without substantial modifications. The draft reorganized ISPM was reviewed by the Standards	C	Category : EDITORIAL (50) South Africa (20 Aug 2024 2:15 PM) Proposal to capitalize these words for consistency

	Committee (SC) and submitted to first consultation in 2023. However, general comments submitted during the consultation supported a full, comprehensive revision of the reorganized ISPM. The reasons supporting a comprehensive revision were as follows:		
28	The draft reorganized ISPM includes a combination of requirements (i.e. obligations) and detailed guidance on the process of conducting a PRA that may be challenging for countries to read, understand and implement.	C	<i>Category : SUBSTANTIVE</i> (162) European Union (29 Sep 2024 2:08 PM) Is this really true? They don't seem to be sure as it is written "that may be challenging". It would be wise to find out whether there really is a problem before undertaking such an onerous task. See also general comment.
28	The draft reorganized ISPM includes a combination of requirements (i.e. obligations) and detailed guidance on the process of conducting a PRA that may be challenging for countries to read, understand and implement.	P	<i>Category : SUBSTANTIVE</i> (161) European Union (29 Sep 2024 2:08 PM) Is it not appropriate to speak about obligations in an ISPM. We suggest deleting the text in brackets.
28	The draft reorganized ISPM includes a combination of requirements (i.e. obligations) and detailed guidance on the process of conducting a PRA that may be challenging for countries to read, understand and implement.	P	<i>Category : SUBSTANTIVE</i> (95) Eppo (13 Sep 2024 2:52 PM) Is it not appropriate to speak about obligations in an ISPM. We suggest deleting the text in brackets.
28	The draft reorganized ISPM includes a combination of requirements (i.e. obligations) and detailed guidance on the process of conducting a PRA that may be challenging for countries to read, understand and implement.	C	<i>Category : SUBSTANTIVE</i> (94) Eppo (13 Sep 2024 2:52 PM) Is this really true? They don't seem to be sure as it is written "that may be challenging". It would be wise to find out whether there really is a problem before undertaking such an onerous task. See also general comment.
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences).	C	<i>Category : SUBSTANTIVE</i> (199) Congo, DR (30 Sep 2024 9:11 PM) nous soutenons ce projet de specification et restons convaincu que l'analyse des risques est un instrument important dans la prevention
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences).	C	<i>Category : SUBSTANTIVE</i> (188) Australia (30 Sep 2024 12:24 PM) Australia recognises the great challenge climate change presents to the work of the IPPC, the current impact it has on contracting parties and the potential impacts in the future. Australia does not consider that climate change can be addressed in PRA however, as PRA is based on current evidence and PRA are conducted at a point in time. In essence, they are living documents that are able to be and should be reviewed and updated as new information comes to light (including changes in pest status for the imported or exporting country, changes in treatment and other risk mitigation measure availability and technologies to name a few). Australia does not know how future impacts of climate change can be addressed in this framework and so considers it should not be addressed through this mechanism.
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of	C	<i>Category : TECHNICAL</i> (164) European Union (29 Sep 2024 2:10 PM) Please note that the TPG recommended avoiding the use of the terms "direct effects" and "indirect effects" because they are inconsistently used in the PRA

	economic, environmental and social consequences).		standard (please see paragraphs 44 and 57 of the TPG December 2023 report).
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences consequences, consideration of organic farming with regard to management options).	P	<i>Category : TECHNICAL</i> (163) European Union (29 Sep 2024 2:09 PM) Useful addition to the text.
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences consequences, consideration of organic farming with regard to management options).	P	<i>Category : TECHNICAL</i> (97) EPPO (13 Sep 2024 2:52 PM) Useful addition to the text.
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences).	C	<i>Category : TECHNICAL</i> (96) EPPO (13 Sep 2024 2:52 PM) Please note that the TPG recommended avoiding the use of the terms "direct effects" and "indirect effects" because they are inconsistently used in the PRA standard (please see paragraphs 44 and 57 of the TPG December 2023 report).
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences).	C	<i>Category : SUBSTANTIVE</i> (86) Nepal (4 Sep 2024 3:23 AM) Inclusion of climate-change consideration, may create very complex scenario to implement the ISPMs. As, PRA relies more on the empirical evidences, so speculative measures relying on climate-change analysis may have trade implications. So, it should be considered very seriously having this in mind.
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences).	P	<i>Category : TECHNICAL</i> (13) COSAVE (15 Aug 2024 12:50 AM) Unnecessary and confusing
29	There is a need to include the requirements identified during the first consultation and to address new phytosanitary challenges (e.g. the inclusion of climate-change considerations in PRA; consideration of direct and indirect pest effects in terms of economic, environmental and social consequences).	C	<i>Category : TECHNICAL</i> (1) United States of America (31 Jul 2024 7:58 PM) Are these the requirements to be included in the new draft ISPM?
31	The comprehensively revised, reorganized ISPM should outline the core principles and requirements for PRA: determining if an organism is a pest and assessing the risk of introduction and consequences within the scope of the IPPC. The ISPM should also outline the requirements for a PRA to clearly describe the relationship between the pest risk and phytosanitary measures, and the strength of these measures at managing this risk, based on the principles outlined in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and ISPM 24 (<i>Guidelines for the</i>	P	<i>Category : SUBSTANTIVE</i> (189) Australia (30 Sep 2024 12:25 PM) ISPM doesn't describe the relationship risks and measures, but requires PRAs to describe the relationship, which is the justification for proposing/recommending/adopting appropriate measures for specific risks.

	<i>determination and recognition of equivalence of phytosanitary measures).</i>		
31	The comprehensively draft revised, reorganized ISPM should outline the core principles and requirements for PRA: determining if an organism is a pest and assessing the risk of introduction and consequences within the scope of the IPPC. The ISPM should also clearly describe the relationship between the pest risk and phytosanitary measures, and the strength of these measures at managing this risk, based on the principles outlined in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and ISPM 24 (<i>Guidelines for the determination and recognition of equivalence of phytosanitary measures</i>).	P	<p>Category : <i>SUBSTANTIVE</i> (165) European Union (29 Sep 2024 2:12 PM) 1) 'comprehensively revised': is it really necessary to keep referring to it in such a long winder, convoluted way throughout the specification?</p> <p>2) We propose to delete some words as it is not needed to describe what PRA is.</p>
31	The comprehensively revised, reorganized ISPM should outline the core principles and requirements for PRA: determining if an organism is a pest and assessing the risk of introduction and consequences within the scope of the IPPC. The ISPM should also clearly describe the relationship between the pest risk and phytosanitary measures measures in place , and the strength of these measures at managing this risk, based on the principles outlined in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and ISPM 24 (<i>Guidelines for the determination and recognition of equivalence of phytosanitary measures</i>).	P	<p>Category : <i>TECHNICAL</i> (137) Kenya (25 Sep 2024 2:07 PM)</p>
31	The comprehensively draft revised, reorganized ISPM should outline the core principles and requirements for PRA: determining if an organism is a pest and assessing the risk of introduction and consequences within the scope of the IPPC. The ISPM should also clearly describe the relationship between the pest risk and phytosanitary measures, and the strength of these measures at managing this risk, based on the principles outlined in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and ISPM 24 (<i>Guidelines for the determination and recognition of equivalence of phytosanitary measures</i>).	P	<p>Category : <i>SUBSTANTIVE</i> (98) EPPO (13 Sep 2024 2:52 PM) 1) 'comprehensively revised': is it really necessary to keep referring to it in such a long winder, convoluted way throughout the specification?</p> <p>2) We propose to delete some words as it is not needed to describe what PRA is.</p>
31	The comprehensively revised, reorganized ISPM should outline the core principles and requirements for PRA: determining if an organism is a pest and assessing the pest risk of introduction and consequences within the scope of the IPPC. The ISPM should also clearly describe the relationship between the pest risk and phytosanitary measures, and the strength of these measures at managing this risk, based on the principles outlined in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and ISPM 24 (<i>Guidelines for the determination and recognition of equivalence of phytosanitary measures</i>).	P	<p>Category : <i>TECHNICAL</i> (14) COSAVE (15 Aug 2024 12:52 AM) Glossary terms should be used when appropriate</p>

31	The comprehensively revised, reorganized ISPM should outline the core principles and requirements for PRA: determining if an organism is a <u>regulated</u> pest and assessing the risk of introduction and consequences within the scope of the IPPC. The ISPM should also clearly describe the relationship between the pest risk and phytosanitary measures, and the strength of these measures at managing this risk, based on the principles outlined in ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>) and ISPM 24 (<i>Guidelines for the determination and recognition of equivalence of phytosanitary measures</i>).	P	Category : TECHNICAL (2) United States of America (31 Jul 2024 7:59 PM) For consistency with para 25
32	The standard <u>should</u> not include guidance on regulated non-quarantine pests, which is provided in ISPM 21 (<i>Pest risk analysis for regulated non-quarantine pests</i>).	C	Category : TECHNICAL (65) Cameroon (22 Aug 2024 10:39 AM) To avoid any confusion, the term 'should' need to be replaced by the term 'will'
32	The standard should not include guidance on <u>PRA for</u> regulated non-quarantine pests, which is provided in ISPM 21 (<i>Pest risk analysis for regulated non-quarantine pests</i>).	P	Category : TECHNICAL (15) COSAVE (15 Aug 2024 12:53 AM) For consistency
34	The purpose of the <u>comprehensive</u> revision of the draft reorganized PRA ISPM is to streamline the text to emphasize the requirements <u>and obligations</u> for <u>PRA in the context of the IPPC PRA</u> and to provide greater clarity <u>for all contracting parties, making the standard easier to understand and use</u> <u>facilitate implementation of the Standard</u>	P	Category : SUBSTANTIVE (166) European Union (29 Sep 2024 2:15 PM) 1) See our related comment on paragraph 31. 2) As noted in a general comment, this was more or less already the purpose of the reorganisation. It should be clear that the revision now will focus also on the improvement of the methodology based on experiences and new knowledge following the last revisions, and that it will improve the standard more from a scientific point of view
34	The purpose of the <u>comprehensive</u> revision of the draft reorganized PRA ISPM is to streamline the text to emphasize the requirements <u>and obligations</u> for PRA <u>in the context of the IPPC</u> and to provide greater clarity <u>for all contracting parties, making the standard easier to understand and use</u> <u>facilitate implementation of the Standard</u> .	P	Category : SUBSTANTIVE (99) Eppo (13 Sep 2024 2:52 PM) 1) See our related comment on paragraph 31. 2) As noted in a general comment, this was more or less already the purpose of the reorganisation. It should be clear that the revision now will focus also on the improvement of the methodology based on experiences and new knowledge following the last revisions, and that it will improve the standard more from a scientific point of view.
35	Tasks	C	Category : TECHNICAL (3) United States of America (31 Jul 2024 8:03 PM) For the EWG, need more clarity on expectations regarding the extent of the changes to the reorganized draft ISPM itself, i.e., beyond streamlining and clarifying the text about principles and requirements for PRA (see task 5).
36	The EWG should undertake the following tasks:	C	Category : SUBSTANTIVE (183) Korea, Republic of (30 Sep 2024 8:26 AM) Korea recommend to add a new task of EWG where guidance and principle on incorporating climate change consideration into PRA.
37	Review existing standards and guidelines for risk analysis developed by other	C	Category : SUBSTANTIVE (192) Australia (30 Sep 2024 12:35 PM)

	standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000) and discuss the potential relevance of the best practices to the IPPC PRA framework.		Looking to others to understand potential different ways of approaching complex tasks is critical for evolution and improvement. This task of looking to others within the three sisters to determine which components, concepts or approaches might suit our purposes is a critical to achieving the outcome of efficiency and clarity in PRA.
37	Review existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000) and discuss the potential relevance of the best practices to the IPPC PRA framework.	C	<i>Category : SUBSTANTIVE</i> (168) European Union (29 Sep 2024 2:18 PM) The EU believes that this task for the EWG is not necessary and useful, considering that the Codex alimentarius and Animal health standards are very different from ISPMs. See our general comment on this issue.
37	Review existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000), and discuss the potential relevance of the best practices to the IPPC PRA framework framework and review examples of NPPO and RPPO PRA schemes to identify elements of best practice.	P	<i>Category : EDITORIAL</i> (167) European Union (29 Sep 2024 2:18 PM) Additional sources of potential best practice added. As we proposed to delete task 1, this is no longer relevant for the EWG. However, it will be relevant information for the SC and SPG.
37	Review existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000) and discuss the potential relevance of the best practices to the IPPC PRA framework.	C	<i>Category : SUBSTANTIVE</i> (145) Mexico (28 Sep 2024 6:37 PM) IPPC uses the term pest risk analysis to refer to its specific form of risk analysis. OIE and Codex simply refer to risk analysis Based on these international regulations, whoever drafts the standard must consider how international trade has changed, its diversification, including the ability to perform "short PRAs"; considering the "intended use" of the consignment, concentrating more on high-risk shipments and speeding up access for those low-risk products whose intended use is consumption or processing and perhaps establishing stringent measures in the case of plant for planting or propagative material. Even so, for seeds or propagative material, today there are good management practices in many countries, such as crop rotation, adequate land preparation, seed variation, pest monitoring, timely application of phytosanitary treatment, system approaches, and so on, that makes their access viable, so as to avoid arbitrary or unjustifiable discrimination or hidden restrictions on international trade and take advantage of supply and demand. A short and concise PRA may be sufficient, provided that justifiable conclusions can be reached after a limited number of steps in the PRA process

			<p>have been completed.</p> <p>The above means facilitating trade and implies a change of mentality to simplify and harmonize the procedures and information flows known to date and associated with the import and export of consignment.</p> <p>It should be noted in the body of the standard that there should be a "rational relationship" between the strength of the measure and the level of risk, and by establishing coherent phytosanitary measures.</p>
37	Review existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission <u>Commission</u> and <u>World Customs Organisation</u>) and the WTO principles for the development of international standards (WTO, 2000) and discuss <u>consider</u> the potential relevance of the best practices to the IPPC PRA framework.	P	<p><i>Category : TECHNICAL</i> (123) PPPO (24 Sep 2024 2:26 AM) Clarity</p> <p>Consider the World Customs Organization (WCO) risk assessment framework</p>
37	Review existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000) and discuss the potential relevance of the best practices to the IPPC PRA framework.	P	<p><i>Category : TECHNICAL</i> (16) COSAVE (15 Aug 2024 12:56 AM) Task moved and modified as last task. Standards developed by other organizations may be considered.</p>
37	Review existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000) and discuss the potential relevance of the best practices to the IPPC PRA framework. <u>Review examples of NPPO and RPPO PRA schemes to identify elements of best practice</u>	P	<p><i>Category : EDITORIAL</i> (101) Eppo (13 Sep 2024 2:52 PM) Additional sources of potential best practice added. As we proposed to delete task 1, this is no longer relevant for the EWG. However, it will be relevant information for the SC and SPG.</p>
37	Review existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000) and discuss the potential relevance of the best practices to the IPPC PRA framework.	C	<p><i>Category : SUBSTANTIVE</i> (100) Eppo (13 Sep 2024 2:52 PM) Eppo believes that this task for the EWG is not necessary and useful, considering that the Codex alimentarius and Animal health standards are very different from ISPMs. See our general comment on this issue.</p>
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on	C	<p><i>Category : SUBSTANTIVE</i> (170) European Union (29 Sep 2024 2:19 PM) The EWG should also consider whether social impact should be considered as a potential consequence of pest introduction, and if so, improve how it is</p>

	economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).		described in the PRA ISPM and provide guidance for implementation material.
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).	C	<i>Category : SUBSTANTIVE</i> (169) European Union (29 Sep 2024 2:19 PM) We believe that it is also important to consider the inclusion of climate-change considerations and the inclusion of aspects on organic farming, in particular regarding the management of quarantine pests.
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).	C	<i>Category : SUBSTANTIVE</i> (146) Mexico (28 Sep 2024 6:39 PM) The use of the term "consequences" (without the qualifier "economic" or "environmental") would be favoured. To be cautious, Mexico considers that the economic effects (in general) of pests can be complex and exceed the immediate effect on the agricultural products directly affected, promoting protectionism. Certain types of effects may not be applicable to a current market that can be readily identified. The use of the term economic effects provides a framework within which a wide range of effects (including environmental and social effects) can be analyzed.
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).	C	<i>Category : SUBSTANTIVE</i> (124) PPPO (24 Sep 2024 2:26 AM) This task is ambiguous and would benefit from clarification. Regardless of whether economic, social and environmental and cultural impacts are addressed together or separately, more guidance and support is required to ensure adequate assessment of these impact is included in the PRA.
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).	C	<i>Category : SUBSTANTIVE</i> (103) Eppo (13 Sep 2024 2:52 PM) We believe that it is also important to consider the inclusion of climate-change considerations and the inclusion of aspects on organic farming, in particular regarding the management of quarantine pests.
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).	C	<i>Category : SUBSTANTIVE</i> (102) Eppo (13 Sep 2024 2:52 PM) The EWG should also consider whether social impact should be considered as a potential consequence of pest introduction, and if so, improve how it is described in the PRA ISPM and provide guidance for implementation material.
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on	C	<i>Category : TECHNICAL</i> (54) Guinea-Bissau (21 Aug 2024 11:15 AM) We should use the horizon tool to prevent the invention pests so it can savie

	economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).		doing PRA
38	Consider recommendations made by the EWG that drafted the reorganized PRA ISPM in 2022, such as considering whether the requirements relating to environmental impact should be addressed as part of the requirements on economic consequences as described in Supplement 2 of ISPM 5 (<i>Glossary of phytosanitary terms</i>).	C	<i>Category : TECHNICAL</i> (18) COSAVE (15 Aug 2024 12:59 AM) Move task 2 after task 3, because task 3 is the main task
39	Review the text of the draft reorganized PRA ISPM as developed by the steward of the topic <i>Reorganization and revision of pest risk analysis standards (2020-001)</i> after the consultation in 2023 (including the annexes) to identify the core principles, steps and requirements for PRA and identify those parts of this draft reorganized ISPM that may be moved to implementation material PRA.	P	<i>Category : SUBSTANTIVE</i> (171) European Union (29 Sep 2024 2:21 PM) We don't think this is needed. Please see the related comment made on paragraph 28 and our two general comments on this issue.
39	Review the text identify those parts of the this draft reorganized PRA-IPM as developed by that may be moved to implementation material and propose how the steward of the topic current IPPC guide could accommodate this material. Reorganization and revision of pest risk analysis standards (2020-001) after the consultation in 2023 (including the annexes) to identify the core principles, steps and requirements for PRA and identify those parts of this draft reorganized ISPM that may be moved to implementation material.	P	<i>Category : EDITORIAL</i> (125) PPPO (24 Sep 2024 2:26 AM) Removed to avoid duplication in task 5. There is already an IPPC guide on PRA.
39	Review the text of the draft reorganized PRA ISPM as developed by the steward of the topic <i>Reorganization and revision of pest risk analysis standards (2020-001)</i> after the consultation in 2023 (including the annexes) to identify the core principles, steps and requirements for PRA and identify those parts of this draft reorganized ISPM that may be moved to implementation material PRA.	P	<i>Category : SUBSTANTIVE</i> (104) EPPO (13 Sep 2024 2:52 PM) We don't think this is needed. Please see the related comment made on paragraph 28 and our two general comments on this issue.
40	Consider the recommendations made by the above steward related to comments submitted during the consultation in 2023.	C	<i>Category : SUBSTANTIVE</i> (172) European Union (29 Sep 2024 2:22 PM) 2023 consultation was not performed in the best conditions. Not all contracting parties submitted comments on parts 'not open for comments' because it was not asked /specified at that moment. Should not all contracting parties be consulted on those parts again ? See also our general comment on this issue.
40	Consider the recommendations made by the above steward related to comments submitted during the consultation in 2023.	P	<i>Category : EDITORIAL</i> (133) Canada (24 Sep 2024 6:31 PM) To improve clarity
40	Consider the recommendations made by the above steward related to comments submitted during the consultation in 2023.	P	<i>Category : SUBSTANTIVE</i> (126) PPPO (24 Sep 2024 2:26 AM) It is unclear what this tasks adds as we don't know the comments of the steward.
40	Consider the recommendations made by the above steward related to comments	C	<i>Category : SUBSTANTIVE</i> (105) EPPO (13 Sep 2024 2:52 PM)

	submitted during the consultation in 2023.		2023 consultation was not performed in the best conditions. Not all contracting parties submitted comments on parts 'not open for comments' because it was not asked /specified at that moment. Should not all contracting parties be consulted on those parts again ? See also our general comment on this issue.
41	Streamline and clarify the text to describe the principles and core requirements of PRA.	C	<i>Category : SUBSTANTIVE</i> (148) Mexico (28 Sep 2024 6:42 PM) The principles of necessity, managed risk, minimal impact, harmonization, non-discrimination, technical justification, cooperation, transparency and equivalence, as described in ISPM 1 and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), are all essential considerations in pest risk management.
41	Streamline and clarify the text to describe the principles and core requirements of PRA-. <u>Including for reference a basic "check-list" of information needed to perform a PRA.</u>	P	<i>Category : SUBSTANTIVE</i> (147) Mexico (28 Sep 2024 6:42 PM) A list of general type of information that may be needed, according to the subject of the analysis
41	Streamline and clarify the text to describe the principles and core requirements of PRA.	C	<i>Category : SUBSTANTIVE</i> (127) PPPO (24 Sep 2024 2:26 AM) Recommend moving this to task 1 as this is the core purpose of the review.
41	Streamline and clarify the text to describe the principles principles, stages and core requirements of PRA.	P	<i>Category : TECHNICAL</i> (19) COSAVE (15 Aug 2024 1:10 AM) Important part for the revision of PRA standards
41	Streamline and clarify the text to describe the principles and core requirements of PRA. <u>(6) - Add New task: Recommend to the SC where the guidance/ principles on the climate change would be appropriate to place in the draft</u>	P	<i>Category : TECHNICAL</i> (4) United States of America (31 Jul 2024 8:06 PM) Does the language for this new task would need to be developed by the same EWG or by other experts?
42	Formulate recommendations to the SC on the content of a potential <u>revised</u> IPPC guide on PRA, with consideration of existing IPPC implementation material.	P	<i>Category : SUBSTANTIVE</i> (193) Australia (30 Sep 2024 12:48 PM) It is important to recognise a guide to PRA already exists and so this would be an update that needs including on the workplan of the IC at some stage. Given the EWG for PRA will be PRA experts, Australia considers that this group could assist in speeding up the process of developing a guide, by including the guide update in their task list (if the meeting is appropriate in length - i.e. two weeks, as proposed in our General Comment)
42	Formulate recommendations to the SC on the content of a potential IPPC guide on PRA, with consideration of existing IPPC implementation material.	C	<i>Category : SUBSTANTIVE</i> (174) European Union (29 Sep 2024 2:23 PM) Please see the comment made on paragraph 28.
42	Formulate recommendations to the SC on the content of a potential IPPC guide on PRA <u>implementation material</u> , with consideration of existing IPPC implementation material.	P	<i>Category : SUBSTANTIVE</i> (173) European Union (29 Sep 2024 2:23 PM) If any implementation material is intended to be produced it will be useful to have it available when the standard is adopted.

42	Formulate recommendations to the SC on the content of a potential IPPC guide on PRAPRA including general principles for conducting pest risk analysis , with consideration of existing IPPC implementation material.	P	<i>Category : SUBSTANTIVE</i> (149) Mexico (28 Sep 2024 6:45 PM) Sometimes PRAs take years and years to be concluded, and when the requirements are established, no one exports because they were too strict and impossible to comply with, thus losing the market opportunity.
42	Formulate recommendations to the SC on the content of a potential IPPC guide on PRA, with consideration of existing IPPC implementation material material and other related materials approved by the CPM .	P	<i>Category : TECHNICAL</i> (131) Canada (24 Sep 2024 5:13 PM) CPM Focus group on Climate and phytosanitary issues has developed useful material that could be considered for the potential IPPC guide on PRA.
42	[NEW TASK] Consider the FAO and IPPC style guides with respect to plain language, readability and translatability when revising the standard. Formulate recommendations to the SC on the content of a potential IPPC guide on PRA, with consideration of existing IPPC implementation material.	P	<i>Category : SUBSTANTIVE</i> (128) PPPO (24 Sep 2024 2:26 AM) Created by merging other changes together
42	Formulate recommendations to the SC on the content of a potential IPPC guide on PRA implementation material , with consideration of existing IPPC implementation material.	P	<i>Category : SUBSTANTIVE</i> (107) Eppo (13 Sep 2024 2:52 PM) If any implementation material is intended to be produced it will be useful to have it available when the standard is adopted.
42	Formulate recommendations to the SC on the content of a potential IPPC guide on PRA, with consideration of existing IPPC implementation material.	C	<i>Category : SUBSTANTIVE</i> (106) Eppo (13 Sep 2024 2:52 PM) Please see the comment made on paragraph 28.
42	Formulate recommendations to the SC on the content of a potential IPPC guide on PRA, with consideration of existing IPPC implementation material .	C	<i>Category : EDITORIAL</i> (70) Bangladesh (28 Aug 2024 11:31 AM) Materials
43	Consider whether the comprehensively revised, reorganized ISPM could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft ISPM.	C	<i>Category : TECHNICAL</i> (175) European Union (29 Sep 2024 2:24 PM) Is this something we usually ask EWG to do in relation to the biodiversity impact statement? We don't recall seeing it previously. Need to consider how appropriate a task this is for an EWG.
43	Consider whether the comprehensively revised, reorganized ISPM could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft ISPM.	C	<i>Category : TECHNICAL</i> (108) Eppo (13 Sep 2024 2:52 PM) Is this something we usually ask EWG to do in relation to the biodiversity impact statement? We don't recall seeing it previously. Need to consider how appropriate a task this is for an EWG.
44	Consider implementation of the comprehensively revised, reorganized ISPM by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on possible solutions to these issues to the SC.	P	<i>Category : SUBSTANTIVE</i> (191) Australia (30 Sep 2024 12:31 PM) Revision is suggested to clarify that possible solutions should be identified for the SC.
45	Review all references to PRA in other ISPMs to ensure that they are still relevant and propose consequential changes if necessary. Review all references to other ISPMs in the draft, comprehensively revised, reorganized ISPM and amend as necessary .	C	<i>Category : SUBSTANTIVE</i> (134) Canada (24 Sep 2024 6:34 PM) Consider the inclusion of an additional task on climate change considerations in PRA (as per paragraphs 29 and 58)
45	Review all references to PRA in other ISPMs to ensure that they are still relevant and propose consequential changes if necessary. Review all references to other	P	<i>Category : TECHNICAL</i> (120) COSAVE (14 Sep 2024 11:54 PM)

	ISPMs in the draft, comprehensively revised, reorganized ISPM and amend as necessary. <u>(10) Consider existing standards and guidelines for risk analysis developed by other standard setting organizations named in the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (World Organisation for Animal Health, Codex Alimentarius Commission) and the WTO principles for the development of international standards (WTO, 2000) and discuss the potential relevance of the best practices to the IPPC PRA framework</u>		Task (1) moved to the end and modified to express that existing standards are to be considered
51	Please refer to the <u>Cujrrent</u> List of topics for IPPC standards posted on the IPP (see https://www.ippc.int/core-activities/standards-setting/list-topics-ippc-standards).	P	<i>Category : EDITORIAL</i> (121) Japan (19 Sep 2024 3:56 PM) For consistency with the title of the IPP page.
58	the consideration of climate change impacts in PRAs; and	P	<i>Category : SUBSTANTIVE</i> (190) Australia (30 Sep 2024 12:28 PM) This does not need to be a requirement. 1. As flagged above, It is not necessary to mandate climate change consideration for individual pest risk assessments, but can be included as a principle in the ISPM to be considered appropriately in the overall pest risk analysis (PRA report) for countries/commodities where relevant/necessary. 2. Expertise in climate change may be of value within the working group but not essential; therefore, remove this or the least, make it 'desirable'.
58	the consideration of climate-change impacts in PRAs; and	P	<i>Category : TECHNICAL</i> (20) COSAVE (15 Aug 2024 1:13 AM) To avoid redundancy
59	PRA for beneficial organisms.	P	<i>Category : SUBSTANTIVE</i> (176) European Union (29 Sep 2024 2:26 PM) Removal of this bullet point, as risk assessment for beneficial organisms should be considered separately as it can be confused with an environmental assessment for the introduction of an alien species for biological control which is out of the scope of PRA.
59	PRA for beneficial organisms.	P	<i>Category : SUBSTANTIVE</i> (109) EPPO (13 Sep 2024 2:52 PM) Removal of this bullet point, as risk assessment for beneficial organisms should be considered separately as it can be confused with an environmental assessment for the introduction of an alien species for biological control which is out of the scope of PRA.
59	PRA for <u>biological control agents and other</u> beneficial organisms.	P	<i>Category : TECHNICAL</i> (21) COSAVE (15 Aug 2024 1:14 AM) To be in line with ISPM 3
59	<u>PRA for beneficial organisms.</u>	C	<i>Category : TECHNICAL</i> (8) United States of America (31 Jul 2024 8:10 PM) Not clear from the tasks why this expertise is required
62	Five to seven members. Eight to ten members	P	<i>Category : SUBSTANTIVE</i> (177) European Union (29 Sep 2024 2:26 PM) The amount and the importance of the tasks requires a broader composition


			of the EWG
62	Seven to nine members. Five to seven members.	P	Category : SUBSTANTIVE (152) China (29 Sep 2024 4:26 AM)
62	Eight to ten members. Five to seven members.	P	Category : SUBSTANTIVE (110) Eppo (13 Sep 2024 2:52 PM) The amount and the importance of the tasks requires a broader composition of the EWG
63	In addition, at least one former member of the EWG on <u>Pest Risk Management and one former member of the EWG on Reorganization and revision of pest risk analysis standards (2020-001), an expert with practical experience in implementing risk analysis standards from a sister organization to the IPPC (e.g. World Organisation for Animal Health)</u> , and a member of the Implementation and Capacity Development Committee should be invited to attend as invited experts.	P	Category : SUBSTANTIVE (178) European Union (29 Sep 2024 2:29 PM) 1) A person from the EWG on pest risk management is very important, due to the part relating to pest risk management being new in the draft overarching standard for PRA. 2) Please see our related comment on paragraph 37 and our general comment on this issue. We propose not including an expert from a sister organisation of the IPPC, as Codex alimentarius and Animal health standards are very different from ISPMs.
63	In addition, at least one former member of the EWG on <u>Reorganization and revision of pest risk analysis standards (2020-001), an expert with practical experience in implementing risk analysis standards from a sister organization to the IPPC (e.g. World Organisation for Animal Health)</u> and a member of the Implementation and Capacity Development Committee should be invited to attend as invited experts.	C	Category : SUBSTANTIVE (150) Mexico (28 Sep 2024 6:48 PM) This is fine, but the approach of the pest risk analysis should be from the perspective of the IPPC and the guidance it provides on pest risk analysis through International Standards for Phytosanitary Measures (or ISPMs). We do not know how to perform a Risk analysis for animals or what they do differently because it is an animal health issue, we feel that the approach is very different.
63	In addition, at least one former member of the EWG on <u>Pest Risk Management and one former member of the EWG on Reorganization and revision of pest risk analysis standards (2020-001), an expert with practical experience in implementing risk analysis standards from a sister organization to the IPPC (e.g. World Organisation for Animal Health) (2020-001)</u> and a member of the Implementation and Capacity Development Committee should be invited to attend as invited experts.	P	Category : SUBSTANTIVE (111) Eppo (13 Sep 2024 2:52 PM) 1) A person from the EWG on pest risk management is very important, due to the part relating to pest risk management being new in the draft overarching standard for PRA. 2) Please see our related comment on paragraph 37 and our general comment on this issue. We propose not including an expert from a sister organisation of the IPPC, as Codex alimentarius and Animal health standards are very different from ISPMs.
63	<u>In addition, at least one former member of the EWG on Reorganization and revision of pest risk analysis standards (2020-001), an expert with practical experience in implementing risk analysis standards from a sister organization to the IPPC (e.g. World Organisation for Animal Health) and a member of the Implementation and Capacity Development Committee should be invited to attend as invited experts.</u>	C	Category : TECHNICAL (7) United States of America (31 Jul 2024 8:09 PM) Is this going to be a member of the EWG or serve as an invited expert?
69	ISPM 2. 2019. Framework for pest risk analysis. IPPC Secretariat. Rome, FAO. Adopted in <u>Adopted</u> 2007. https://www.ippc.int/en/publications/592/	P	Category : EDITORIAL (179) European Union (29 Sep 2024 2:30 PM) 1) ISPM 2 should be referenced just after ISPM 1.



69	<p>ISPM 2. 2019. <i>Framework for pest risk analysis</i>. IPPC Secretariat. Rome, FAO. Adopted in 2007. https://www.ippc.int/en/publications/592/</p>	<p>P</p> <p>Category : <i>EDITORIAL</i> (112) Eppo (13 Sep 2024 2:52 PM) 1) ISPM 2 should be referenced just after ISPM 1. 2) Deletion of "in" for consistency with paragraphs 67, 70, 71 and 72.</p>
76	<p>Information to support the development of this standard may be available on the IPP at: https://www.ippc.int/en/about/core-activities/capacity-development/guides-and-training-materials/</p> <p><u>COSAVE (Comité de Sanidad Vegetal del Cono Sur). 2016. Guía para el desarrollo de Análisis de Riesgo de Plagas (ARP) por plaga.</u></p> <p><u>http://www.cosave.org/sites/default/files/resoluciones/anexos/Anexo%20Resoluci%C3%B3n%202021-%20Guia%20ARP%20por%20plaga%20julio%202016.pdf</u></p> <p><u>COSAVE (Comité de Sanidad Vegetal del Cono Sur). 2016. Guía para el desarrollo de Análisis de Riesgo de Plagas (ARP) por vía.</u></p> <p><u>http://www.cosave.org/sites/default/files/resoluciones/anexos/Anexo%20Resoluci%C3%B3n%202021-%20Guia%20ARP%20por%20v%C3%ADa%20julio%202016.pdf</u></p>	<p>P</p> <p>Category : <i>TECHNICAL</i> (22) COSAVE (15 Aug 2024 1:16 AM) Add relevant references</p>
77	<p>Eppo (European and Mediterranean Plant Protection Organization). 2011. <i>Guidelines on pest risk analysis</i>. PM 5/3(5). 44 pp. https://www.eppo.int/media/uploaded_images/RESOURCES/eppo_standards/pm5/pm5-03-05-en.pdf</p>	<p>C</p> <p>Category : <i>TECHNICAL</i> (180) European Union (29 Sep 2024 2:31 PM) We recommend adding also the Eppo document 'Guidance document for the drafting of a PRA according to the Express PRA scheme (Eppo Standard PM 5/5)' (available at https://gd.eppo.int/download/standard/119/guidance_pm5-005-1-en_2024.pdf).</p>
77	<p>Eppo (European and Mediterranean Plant Protection Organization). 2011. <i>Guidelines on pest risk analysis</i>. PM 5/3(5). 44 pp. https://www.eppo.int/media/uploaded_images/RESOURCES/eppo_standards/pm5/pm5-03-05-en.pdf</p>	<p>C</p> <p>Category : <i>TECHNICAL</i> (113) Eppo (13 Sep 2024 2:52 PM) We recommend adding also the Eppo document 'Guidance document for the drafting of a PRA according to the Express PRA scheme (Eppo Standard PM 5/5)' (available at https://gd.eppo.int/download/standard/119/guidance_pm5-005-1-en_2024.pdf).</p>
78	<p>FAO and World Health Organization. 2007. <i>Working principles for risk analysis for food safety for application by governments</i>. CXG 62-2007. Codex Alimentarius Commission. Rome. https://www.fao.org/fao-who-codexalimentarius/codex-texts/guidelines/</p>	<p>P</p> <p>Category : <i>TECHNICAL</i> (23) COSAVE (15 Aug 2024 1:17 AM) Add relevant references</p>

	<p>IICA. 2018. Guidelines of procedures for risk assessment of plants as pests (weeds). https://repositorio.iica.int/bitstream/handle/11324/7253/BVE19029517i.pdf?sequence=2&isAllowed=y</p> <p>IICA. Guidelines to assess the economic effects and non-commercial and environmental consequences of the entry of pests. https://repositorio.iica.int/bitstream/handle/11324/7905/BVE19040206i.pdf?sequence=2&isAllowed=y</p>	
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2024 FIRST CONSULTATION 1 July – 30 September 2024**Compiled comments for Draft specification on revision of the draft reorganized pest risk analysis ISPM (2023-037) - Spanish**






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 : EDITORIAL</i> (12) Colombia (14 Aug 2024 5:13 PM) Se entiende que este documento es de tipo informativo. No obstante, se encontró que algunos de los enlaces incluidos que no eran funcionales por lo tanto no se podía consultar la referencia.
25	El análisis del riesgo de plagas (ARP) es un proceso básico del ámbito de la Convención Internacional de Protección Fitosanitaria (CIPF) y un importante instrumento de evaluación con base científica para las organizaciones nacionales de protección fitosanitaria (ONPF). Se utiliza para identificar las plagas y vías preocupantes, determinar si las plagas cumplen los requisitos para ser consideradas plagas reglamentadas y establecer las medidas fitosanitarias apropiadas con el fin de manejar el riesgo de introducción y dispersión de plagas en un área de ARP concreta.	C	<i>Category : TECHNICAL</i> (74) Honduras (1 Sep 2024 5:37 PM) utilia para identificar los riesgos asociados a las plagas, para generar medidas de mitigacion y para determinar las potencias vias de traslado de las plagas
25	El análisis del riesgo de plagas (ARP) es un proceso básico del ámbito de la Convención Internacional de Protección Fitosanitaria (CIPF) y un importante instrumento de evaluación con base científica para las organizaciones nacionales de protección fitosanitaria (ONPF). Se utiliza para identificar <u>los riesgos asociados a las plagas y vías preocupantesvías</u> , determinar si las plagas cumplen los requisitos para ser consideradas plagas reglamentadas y establecer las medidas fitosanitarias apropiadas con el fin de manejar el riesgo de introducción y dispersión de plagas en un área de ARP concreta.	P	<i>Category : TECHNICAL</i>  Dominican Republic (46) OIRSA (19 Aug 2024 3:49 AM) mejor redacción
25	El análisis del riesgo de plagas (ARP) es un proceso básico del ámbito de la Convención Internacional de Protección Fitosanitaria (CIPF) y un importante instrumento de evaluación con base científica para las organizaciones nacionales de protección fitosanitaria (ONPF). Se utiliza para identificar las plagas y vías <u>de</u> preocupantes, determinar si las plagas cumplen los requisitos para ser consideradas plagas reglamentadas y establecer las medidas fitosanitarias apropiadas con el fin de manejar el riesgo de introducción y dispersión de plagas en un área de ARP concreta.	P	<i>Category : TRANSLATION</i> (37) Nicaragua (16 Aug 2024 7:36 PM)
25	El análisis del riesgo de plagas (ARP) es un proceso básico del ámbito de la	P	<i>Category : TRANSLATION</i> (36) Nicaragua (16 Aug 2024 7:35 PM)


	Convención Internacional de Protección Fitosanitaria (CIPF) y un importante instrumento de evaluación con base científica para las organizaciones nacionales de protección fitosanitaria (ONPF). Se utiliza para identificar las plagas y vías preocupantes, ingreso determinar si las plagas cumplen los requisitos para ser consideradas plagas reglamentadas y establecer las medidas fitosanitarias apropiadas con el fin de manejar el riesgo de introducción y dispersión de plagas en un área de ARP concreta.		Término más apropiado
26	En 2022, el Grupo de trabajo de expertos sobre la Reorganización y revisión de las normas relacionadas con el ARP (2020-001) se encargó de reorganizar las NIMF relacionadas con este tema, a saber, la NIMF 2, <i>Marco para el análisis de riesgo de plagas</i> , la NIMF 11, <i>Análisis de riesgo de plagas para plagas cuarentenarias</i> , y el proyecto de NIMF sobre <i>Manejo del riesgo de plagas para plagas cuarentenarias</i> (2014-001) en un único proyecto de NIMF general con anexos para cada etapa del ARP. La reorganización consistió en eliminar redundancias en el texto sin modificaciones sustanciales. El proyecto de reorganización de NIMF fue examinado por el Comité de Normas (CN) y presentado para someterlo a primera consulta en 2023. No obstante, los comentarios generales presentados durante la consulta eran favorables a la revisión completa y exhaustiva de la NIMF reorganizada. Los motivos aducidos para respaldar la revisión exhaustiva fueron los siguientes:	C	<p><i>Category : SUBSTANTIVE</i></p> <p> Honduras (75) Honduras (1 Sep 2024 5:40 PM) De acuerdo con este parrafo</p>
29	Es necesario incluir los requisitos determinados durante la primera consulta y abordar nuevos desafíos fitosanitarios (por ejemplo, la inclusión de consideraciones relativas al cambio climático en los ARP o la consideración de los efectos directos e indirectos de las plagas en los ámbitos económico, ambiental y social).	C	<p><i>Category : SUBSTANTIVE</i></p> <p> Honduras (76) Honduras (1 Sep 2024 5:41 PM) De acuerdo</p>
29	Es necesario incluir los requisitos determinados durante la primera consulta y abordar nuevos desafíos fitosanitarios (por ejemplo, la inclusión de consideraciones relativas al cambio climático en los ARP o la consideración de los efectos directos e indirectos de las plagas en los ámbitos económico, ambiental y social).	P	<p><i>Category : TECHNICAL</i></p> <p>(35) Argentina (15 Aug 2024 8:44 PM) Para simplificación</p>
31	En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción y sus consecuencias en el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad de estas medidas en el manejo del riesgo, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de</i>	C	<p><i>Category : TECHNICAL</i></p> <p>(77) Honduras (1 Sep 2024 5:43 PM) Se considera el riesgo de introduccion, dispesion y sus consecuencia</p>

	<i>medidas fitosanitarias en el comercio internacional, y la NIMF 24, Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias.</i>		
31	En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción <u>introducción, dispersión</u> y sus consecuencias en el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad de estas medidas en el manejo del riesgo, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i> , y la NIMF 24, <i>Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias.</i>	P	<i>Category : TECHNICAL</i> (47) OIRSA (19 Aug 2024 3:51 AM) ampliar el riesgo
31	En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción <u>introducción, dispersión, establecimiento</u> y sus consecuencias en el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad de estas medidas en el manejo del riesgo, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i> , y la NIMF 24, <i>Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias.</i>	P	<i>Category : TECHNICAL</i> (41) Nicaragua (16 Aug 2024 7:48 PM)
31	En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción <u>introducción, dispersión</u> y sus consecuencias en el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad de estas medidas en el manejo del riesgo, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i> , y la NIMF 24, <i>Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias.</i>	P	<i>Category : TECHNICAL</i> (40) Nicaragua (16 Aug 2024 7:47 PM)
31	En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción <u>introducción, establecimiento</u> y sus consecuencias en	P	<i>Category : TECHNICAL</i> (39) Nicaragua (16 Aug 2024 7:46 PM)

	<p>el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad de estas medidas en el manejo del riesgo, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>, y la NIMF 24, <i>Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias</i>.</p>		
31	<p>En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción <u>introducción, dispersión</u> y sus consecuencias en el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad de estas medidas en el manejo del riesgo, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>, y la NIMF 24, <i>Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias</i>.</p>	P	<p><i>Category : TECHNICAL</i> (38) Nicaragua (16 Aug 2024 7:40 PM) En el ARP además de evaluar el riesgo de introducción se evalúa su capacidad de diseminación</p>
31	<p>En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción y sus consecuencias en el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad <u>intensidad</u> de estas medidas en el manejo del riesgo, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>, y la NIMF 24, <i>Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias</i>.</p>	P	<p><i>Category : TRANSLATION</i> (26) Argentina (15 Aug 2024 8:17 PM) Traducción correcta</p>
31	<p>En la NIMF reorganizada y revisada de forma exhaustiva deberían figurar los principios básicos y los requisitos para el ARP: determinar si un organismo es una plaga y evaluar el riesgo de introducción <u>de plagas</u> y sus consecuencias en el ámbito de la CIPF. En la NIMF también se debería describir con claridad la relación entre el riesgo de plagas y las medidas fitosanitarias, y la rigurosidad de estas medidas en el manejo del riesgo <u>riesgo de plagas</u>, sobre la base de los principios recogidos en la NIMF 1, <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>, y la NIMF 24, <i>Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias</i>.</p>	P	<p><i>Category : TECHNICAL</i> (25) Argentina (15 Aug 2024 8:17 PM) Deben usarse los términos del Glosario</p>

32	En cambio, no debería contener orientación relativa a las plagas no cuarentenarias reglamentadas, que se proporciona en la NIMF 21, <i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i> .	C	Category : TECHNICAL  Honduras (80) Honduras (1 Sep 2024 5:53 PM) Debe aplicarse para el ARP de plagas no cuarentenarias.
32	En cambio, no debería contener orientación relativa a las plagas no cuarentenarias reglamentadas, que se proporciona en la NIMF 21, <i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i> .	C	Category : TECHNICAL (79) Honduras (1 Sep 2024 5:47 PM) Deber de ser sobre el ARP de plagas no cuarentenarias
32	En cambio, no debería contener orientación relativa a las plagas no cuarentenarias reglamentadas, que se proporciona en la NIMF 21, <i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i> .	C	Category : TECHNICAL  Honduras (78) Honduras (1 Sep 2024 5:45 PM) Debe ser sobre el ARP de plagas no cuarentenarias
32	En cambio, no debería contener orientación relativa a las sobre ARP para plagas no cuarentenarias reglamentadas, que se proporciona en la NIMF 21, <i>Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas</i> .	P	Category : TECHNICAL (27) Argentina (15 Aug 2024 8:19 PM) Por consistencia
34	La finalidad de la revisión exhaustiva del proyecto de reorganización de la NIMF relacionada con el ARP es simplificar el texto para hacer hincapié en los requisitos y las obligaciones para el ARP en el contexto de la CIPF y aportar mayor claridad para todas las partes contratantes, haciendo la norma más fácil de entender y utilizar.	C	Category : EDITORIAL  Honduras (81) Honduras (1 Sep 2024 5:55 PM) De acuerdo al texto
37	Examinar las normas y directrices existentes en materia de análisis de riesgos que hayan elaborado otras organizaciones de establecimiento de normas nombradas en el Acuerdo de la Organización Mundial del Comercio (OMC) sobre la aplicación de medidas sanitarias y fitosanitarias (Organización Mundial de Sanidad Animal, Comisión del Codex Alimentarius) y los principios de la OMC relativos a la elaboración de normas internacionales (OMC, 2000), y examinar la posible pertinencia de las mejores prácticas para el marco de la CIPF sobre ARP.	C	Category : TECHNICAL  Honduras (82) Honduras (1 Sep 2024 5:57 PM) De acuerdo al COMENTARIO DE LA REPUBLICA ARGENTINA
37	Examinar las normas y directrices existentes en materia de análisis de riesgos que hayan elaborado otras organizaciones de establecimiento de normas nombradas en el Acuerdo de la Organización Mundial del Comercio (OMC) sobre la aplicación de medidas sanitarias y fitosanitarias (Organización Mundial de Sanidad Animal, Comisión del Codex Alimentarius) y los principios de la OMC relativos a la elaboración de normas internacionales (OMC, 2000), y examinar la posible pertinencia de las mejores prácticas para el marco de la CIPF sobre ARP.	P	Category : TECHNICAL  Honduras (28) Argentina (15 Aug 2024 8:23 PM) Esta tarea no es pertinente para el propósito de revisión de la reorganización de los borradores de normas de ARP
38	Considerar las recomendaciones formuladas por el GTE que redactó la NIMF reorganizada sobre ARP en 2022, por ejemplo, si los requisitos relativos al	C	Category : TECHNICAL (83) Honduras (1 Sep 2024 5:59 PM) Debe de ser repercusiones economicas

	impacto ambiental se deberían abordar como parte de los requisitos relativos a las consecuencias económicas que se describen en el Suplemento 2 de la NIMF 5, <i>Glosario de términos fitosanitarios</i> .		
38	Considerar las recomendaciones formuladas por el GTE que redactó la NIMF reorganizada sobre ARP en 2022, por ejemplo, si los requisitos relativos al impacto ambiental se deberían abordar como parte de los requisitos relativos a las consecuencias-repercusiones económicas que se describen en el Suplemento 2 de la NIMF 5, <i>Glosario de términos fitosanitarios</i> .	P	<i>Category : EDITORIAL</i> (48) OIRSA (19 Aug 2024 3:52 AM) uso correcto del término
38	Considerar las recomendaciones formuladas por el GTE que redactó la NIMF reorganizada sobre ARP en 2022, por ejemplo, si los requisitos relativos al impacto ambiental se deberían abordar como parte de los requisitos relativos a las consecuencias económicas que se describen en el Suplemento 2 de la NIMF 5, <i>Glosario de términos fitosanitarios</i> .	C	<i>Category : TECHNICAL</i> (29) Argentina (15 Aug 2024 8:28 PM) Mover el párrafo 38 después del párrafo 39 debido a que la tarea descrita en el párrafo 39 es la tarea principal
41	Simplificar y aclarar el texto para describir los principios básicos y los requisitos básicos del ARP.	P	<i>Category : TECHNICAL</i> (42) Nicaragua (16 Aug 2024 7:49 PM) Basado en la NIMF 2
41	Simplificar y aclarar el texto para describir los principios-principios, las etapas y los requisitos básicos del ARP.	P	<i>Category : TECHNICAL</i> (30) Argentina (15 Aug 2024 8:35 PM) 1) Las "etapas" son una parte importante en la revisión de las normas de ARP. 2) No es necesario especificar "básicos"
43	Considerar si la NIMF reorganizada y revisada de forma exhaustiva podría afectar específicamente (de forma positiva o negativa) a la protección de la biodiversidad y al medio ambiente. En caso afirmativo, estos efectos deberían determinarse, abordarse y aclararse en el proyecto de NIMF.	C	<i>Category : SUBSTANTIVE</i> (84) Honduras (1 Sep 2024 6:04 PM) Es estrictamente necesario la intergracion multidisciplinaria para este caso
43	Considerar si la NIMF reorganizada y revisada de forma exhaustiva podría afectar específicamente (de forma positiva o negativa) a la protección de la biodiversidad y al medio ambiente. En caso afirmativo, estos efectos deberían determinarse, abordarse y aclararse en el proyecto de NIMF.	C	<i>Category : SUBSTANTIVE</i> (53) Dominican Republic (20 Aug 2024 9:53 PM) Se debe considerar si al evaluar este punto se sugiere a las ONPF la creación de un grupo técnico multidisciplinario, en donde se estile estar compuesto, por representantes de Sanidad Vegetal, Vida Silvestre (CITES), Sanidad Animal (cuando aplique), Manejo de aguas (especialmente subterráneas), con responsabilidades y aval internacional.
43	Considerar si la NIMF reorganizada-modificada y revisada de forma exhaustiva podría afectar específicamente (de forma positiva o negativa) a la protección de la biodiversidad y al medio ambiente. En caso afirmativo, estos efectos deberían determinarse, abordarse y aclararse en el proyecto de NIMF.	P	<i>Category : EDITORIAL</i> (43) Nicaragua (16 Aug 2024 7:54 PM) Mejor comprensión del texto
44	Considerar la aplicación de la NIMF reorganizada-modificada y revisada de forma exhaustiva por las partes contratantes y determinar los posibles problemas operativos y técnicos de la aplicación. Facilitar información y formular posibles recomendaciones sobre estos problemas al CN.	P	<i>Category : EDITORIAL</i> (44) Nicaragua (16 Aug 2024 7:54 PM) Mejor comprensión
45	Examinar todas las referencias al ARP que aparezcan en otras NIMF para	P	<i>Category : EDITORIAL</i>

	garantizar que dichas referencias todavía sean pertinentes y proponer, cuando proceda, los consiguientes cambios. Examinar todas las referencias a otras NIMF que aparezcan en la NIMF reorganizada <u>modificada</u> y revisada exhaustivamente y hacer las modificaciones necesarias.		(45) Nicaragua (16 Aug 2024 7:56 PM) Mejor comprensión del texto
58	consideración de los efectos del cambio climático en los ARP;	P	<i>Category : TECHNICAL</i> (31) Argentina (15 Aug 2024 8:36 PM) Para evitar redundancia
59	ARP para organismos beneficiosos <u>benéficos</u> .	P	<i>Category : TECHNICAL</i> (49) OIRSA (19 Aug 2024 3:53 AM) Uso correcto de términos
59	ARP para <u>agentes de control biológico y otros</u> organismos beneficiosos.	P	<i>Category : TECHNICAL</i> (32) Argentina (15 Aug 2024 8:37 PM) Por consistencia con las definiciones de la NIMF 3
76	La información para respaldar la elaboración de esta norma se puede consultar en el PFI en https://www.ippc.int/es/about/core-activities/capacity-development/guides-and-training-materials/ <u>COSAVE (Comité de Sanidad Vegetal del Cono Sur). 2016. Guía para el desarrollo de Análisis de Riesgo de Plagas (ARP) por plaga.</u> http://www.cosave.org/sites/default/files/resoluciones/anexos/Anexo%20Resoluci%C3%B3n%202021-%20Guia%20ARP%20por%20plaga%20julio%202016.pdf <u>COSAVE (Comité de Sanidad Vegetal del Cono Sur). 2016. Guía para el desarrollo de Análisis de Riesgo de Plagas (ARP) por vía.</u> http://www.cosave.org/sites/default/files/resoluciones/anexos/Anexo%20Resoluci%C3%B3n%202021-%20Guia%20ARP%20por%20v%C3%ADa%20julio%202016.pdf	P	<i>Category : TECHNICAL</i> (33) Argentina (15 Aug 2024 8:38 PM) Referencias pertinentes agregadas
79	Organización Norteamericana de Protección a las Plantas (NAPPO) . 2012. <i>Directrices generales para el análisis de riesgo de la vía</i> . NRMF 31. Ottawa. 20 págs. https://www.nappon.org/application/files/8615/8352/2976/RSPM_31-01-06-12-e.pdf <u>IICA. 2018. Guidelines of procedures for risk assessment of plants as pests (weeds).</u> https://repositorio.iica.int/bitstream/handle/11324/7253/BVE19029517i.pdf?sequence=2&isAllowed=y	P	<i>Category : TECHNICAL</i>  Honduras (34) Argentina (15 Aug 2024 8:39 PM) Referencias pertinentes agregadas

	<p><u>IICA. Guidelines to assess the economic effects and non-commercial and environmental consequences of the entry of pests.</u> <u>https://repositorio.iica.int/bitstream/handle/11324/7905/BVE19040206i.pdf?sequence=2&isAllowed=y</u></p>	
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2024 FIRST CONSULTATION 1 July – 30 September 2024**Compiled comments for Draft specification on revision of the draft reorganized pest risk analysis ISPM (2023-037) - French**

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> (139) Benin (26 Sep 2024 1:19 PM) Il est important de conserver les organismes nuisibles réglementés non de quarantaine dans la norme
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (64) IPPC Regional Workshop Africa (22 Aug 2024 10:13 AM) Le Cameroun soutient le draft de spécification pour la révision des NIMPs sur l'ARP
25	L'analyse du risque phytosanitaire (ARP) est un processus essentiel dans le champ d'application de la CIPV et elle constitue un outil d'évaluation scientifique important pour les organisations nationales pour la protection des végétaux (ONPV). Elle permet de définir les organismes nuisibles et les filières visés, de déterminer si ces organismes remplissent les conditions pour être des organismes nuisibles réglementés, et de choisir les mesures phytosanitaires qui conviennent pour gérer le risque d'introduction et de dissémination d'un organisme nuisible dans une zone ARP donnée.	C	<i>Category : TECHNICAL</i> (58) Cote d'Ivoire (21 Aug 2024 7:30 PM) PROPOSITION DE REFORMULATION: "de déterminer si ces organismes biologiques remplissent les conditions pour être classés comme des organismes nuisibles réglementés, notamment des organismes de quarantaine". La précision "organismes de quarantaine" dans cette nouvelle norme relative à l'ARP se justifie par le fait que le terme "organismes réglementés", employé uniquement, inclut les organismes réglementés non de quarantaine qui sont traités séparément par la NIMP 21.
31	La NIMP réorganisée, entièrement révisée, devrait indiquer les principes et exigences essentiels relatifs à l'ARP: déterminer si un organisme est un organisme nuisible et évaluer le risque d'introduction et les conséquences en ce qui concerne le champ d'application de la CIPV. La NIMP devrait également décrire clairement le lien entre le risque phytosanitaire et les mesures phytosanitaires, ainsi que l'utilité de ces mesures pour la gestion de ce risque, sur la base des principes énoncés dans le NIMP 1 (<i>Principes phytosanitaires pour la protection des végétaux et l'application de mesures phytosanitaires dans le cadre du commerce international</i>) et la NIMP 24 (<i>Directives pour la détermination et la reconnaissance de l'équivalence des mesures phytosanitaires</i>).	C	<i>Category : EDITORIAL</i> (57) Cote d'Ivoire (21 Aug 2024 7:15 PM) Remplacer "le" par "la"
31	La NIMP réorganisée, entièrement révisée, devrait indiquer les principes et exigences essentiels relatifs à l'ARP: déterminer si un organisme est un organisme nuisible et évaluer le risque d'introduction et les conséquences en ce qui concerne le champ d'application de la CIPV. La NIMP devrait également décrire clairement	C	<i>Category : TECHNICAL</i> (55) Cote d'Ivoire (21 Aug 2024 7:07 PM) PROPOSITION DE REFORMULATION: "déterminer si un organisme biologique est nuisible pour les plantes et les produits végétaux"

	le lien entre le risque phytosanitaire et les mesures phytosanitaires, ainsi que l'utilité de ces mesures pour la gestion de ce risque, sur la base des principes énoncés dans le NIMP 1 (<i>Principes phytosanitaires pour la protection des végétaux et l'application de mesures phytosanitaires dans le cadre du commerce international</i>) et la NIMP 24 (<i>Directives pour la détermination et la reconnaissance de l'équivalence des mesures phytosanitaires</i>).		
31	La NIMP réorganisée, entièrement révisée, devrait indiquer les principes et exigences essentiels relatifs à l'ARP: déterminer si un organisme est un organisme nuisible et évaluer le risque d'introduction et les conséquences en ce qui concerne le champ d'application de la CIPV. La NIMP devrait également décrire clairement le lien entre le risque phytosanitaire et les mesures phytosanitaires, ainsi que l'utilité de ces mesures pour la gestion de ce risque, sur la base des principes énoncés dans le NIMP 1 (<i>Principes phytosanitaires pour la protection des végétaux et l'application de mesures phytosanitaires dans le cadre du commerce international</i>) et la NIMP 24 (<i>Directives pour la détermination et la reconnaissance de l'équivalence des mesures phytosanitaires</i>).	C	<i>Category : EDITORIAL</i> (11) Senegal (12 Aug 2024 11:46 AM) Déterminer si un organisme est nuisible et évaluer.....
32	La norme ne devrait pas porter sur les organismes réglementés non de quarantaine , les instructions y relatives figurant déjà dans la NIMP 21 (<i>Analyse du risque phytosanitaire pour les organismes réglementés non de quarantaine</i>).	C	<i>Category : SUBSTANTIVE</i> (138) Benin (26 Sep 2024 1:17 PM) A l'issue d'une ARP, les résultats peuvent déboucher sur n'importe quelle catégorie d'organisme nuisible réglementé. Il est important de garder dans le texte les organismes nuisibles réglementés non de quarantaine
32	La norme ne devrait pas porter sur les organismes réglementés non de quarantaine , les instructions y relatives figurant déjà dans la NIMP 21 (<i>Analyse du risque phytosanitaire pour les organismes réglementés non de quarantaine</i>).	C	<i>Category : SUBSTANTIVE</i> (56) Cote d'Ivoire (21 Aug 2024 7:12 PM) PROPOSITION DE REFORMULATION: "La présente norme ne porte pas sur les organismes réglementés non de quarantaine" La formulation actuelle mise au conditionnel ouvre la voie à utiliser la nouvelle norme pour les organismes réglementés non de quarantaine, déjà traités par la NIMP 21.
62	Cinq à sept membres.	C	<i>Category : SUBSTANTIVE</i> (59) Cote d'Ivoire (21 Aug 2024 7:35 PM) Le nombre de participants pourrait être augmenté, en prévoyant, à la base un expert provenant de chaque Région de la FAO (soit sept experts au minimum). D'autres compétences pourront être naturellement associées à cette équipe de base.
63	En outre, au moins un ancien membre du groupe de travail d'experts chargé des <i>Réorganisation et révision des normes relatives à l'analyse du risque phytosanitaire</i> (2020-001), un expert possédant une expérience pratique de la mise en œuvre de normes relatives à l'analyse des risques venant d'une organisation sœur de la CIPV (Organisation mondiale de la santé animale, par exemple) et un membre du Comité chargé de la mise en œuvre et du renforcement des capacités	C	<i>Category : TECHNICAL</i> (60) Senegal (21 Aug 2024 10:11 PM) Ce membre n'aura pas une expertise relative aux questions phytosanitaires conformément aux critères précités plus haut Madagascar (30 Sep 2024 10:29 PM) A mon avis, cela ne posera aucun problème parce que la partie animale est beaucoup plus avancée sur ce point surtout au niveau du processus. Cette personne nous servira de guide

	devraient être invités à participer en tant qu'experts invités.		
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