

March 2007



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COMMISSION ON PHYTOSANITARY MEASURES

Second Session

Rome, 26 – 30 March 2007

Comments on draft standards (CPM 2007/2 - Annex V)
Establishment of areas of low pest prevalence for fruit flies (Tephritidae)

Agenda Item 9.2 of the Provisional Agenda

Document by the IPPC Secretariat

1. The Secretariat compiled comments received in advance of the CPM on the draft ISPM on establishment of areas of low pest prevalence for fruit flies (Tephritidae) from the following members and RPPO:

- Argentina
- Australia
- Bolivia
- Brazil
- Canada
- Chile
- COSAVE
- Japan
- Korea (Republic)
- New Zealand
- Paraguay
- Uruguay
- USA.

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Draft ISPMs for adoption at CPM-2 (2007)

ANNEX V OF DOCUMENT CPM 2007/2

DRAFT ISPM: ESTABLISHMENT OF AREAS OF LOW PEST PREVALENCE FOR FRUIT FLIES (TEPHRITIDAE)

The following are comments received as of 14 March 2007 according to guidelines given in the document CPM 2007/2. They are provided for information and the final document will be provided at the CPM meeting.

The Secretariat has compiled in the order of the text the comments received in advance of the CPM meeting, exactly as provided by countries.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
1.	GENERAL COMMENTS	Australia	SUBSTANTIVE			<p>Australia is not able to accept the current draft for adoption at CPM 2. Our general comments outline the reasons for this. More specific, substantive comments are provided in reference to the draft document.</p> <p>The topic of this standard is much more complex than that of pest free areas and requires integration with a system which is much more reliant on effective risk analysis and potentially much more subjective. The elements of suppression and eradication are significant and it may be prudent to wait until that draft standard is finalised before integrating these elements into this standard for areas of low pest prevalence.</p> <p>As a technical guidance standard relevant to a specific group of organisms, it is important that the final draft is analysed for its relevance and applicability across the spectrum of Tephritid fruit flies of economic importance.</p> <p>A significant weakness in the draft is the minimal correlation made between the purpose and outcome of establishing an ALPP. Technical aspects of the mechanics in setting up and maintaining an area are well defined and would seem to be based on practical experience. However, ISPM 22 provides significantly more guidance on the nature of ALPP including their advantages and limitations. While the draft makes reference to ISPM 22, it would benefit from greater explanation of the purpose of the area and how measures applied must deliver it ie an ALPP to support trade as part of a systems approach, based on a pest risk analysis, to meet the appropriate level of protection of the importing country; and/or to achieve pest suppression to reduce the cost of production. The ALPP technical elements, while based heavily on the biology and population dynamics of the fruit fly species/s may also vary according to the purpose of the ALPP and the outcome sought. For the export outcome, there may be a requirement for greater rigour in monitoring, verifying and implementing corrective action to sustain trade, and this would have to be negotiated bilaterally with the trading partner and should be risk based.</p> <p>Australia is submitting a large number of comments, both substantive and editorial, on this draft in addition to those provided previously during country consultation. Given the experience at CPM 1, Australia does not believe that it is appropriate for significant informal work on the draft during CPM 2 to try to achieve a draft that can be adopted at the meeting. Even though last year's work was successful in finalising ISPM 26, it is not appropriate to use the CPM in this manner to finalise standards not least as it prevents countries from seeking technical advice prior to the standard being adopted.</p> <p>Australia notes that the November 2006 Standards Committee report states that: <i>66. The SC considered changes that had been made to the draft standard as a result of the ad hoc working group meeting. Further issues were raised and considered. Several members of the SC pointed out that considerable changes to the structure and, in some cases, the content of the draft had been made. The SC noted that ICPM-6 (2004) had requested the SC to produce guidance concerning drafts which had been significantly modified and the criteria for</i></p>

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					<p><i>returning drafts to expert drafting groups for further consideration and/or a further round of country consultation.</i></p> <p>67. <i>After discussion, the SC recommended that the draft be considered by the CPM but agreed that if the number of comments received on the draft prior to the CPM was too large to be considered during the meeting, then the draft would be withdrawn and sent to the TPF for further consideration and another round of country consultation.</i></p> <p>Australia therefore requests that the undertaking given in para 67 be carried out and this draft be withdrawn from the CPM 2 agenda and sent to the TPF for further consideration and another round of country consultation. Australia would seek to have comments provided in this paper made available to the TPF for consideration.</p> <p>To ensure that a similar issue is not again faced by parties, it would be appropriate that the Standards Committee produce guidance, as noted in para 66, to deal with cases where the number and nature of country comments result in significant reworking of the draft.</p> <p>The IPPC should be striving to achieve quality standards, not quantity that in fact causes more work in the longer term due to increased revisions being required. There is a need to ensure that there is appropriate editorial review and adequate cross referencing to other relevant standards before drafts are released for country comment. This would lessen the number of comments submitted to those relating to substantive concerns.</p>	
2.	GENERAL COMMENTS	New Zealand	Editorial /technical	New Zealand would prefer to see this draft sent back to the Standards Committee for further work – in particular the structure of the draft. See following comments.		<p>Format and content (that is headings) need to align more closely with ISPMs 26 & 22 <i>Establishment of Pest Free Areas for Fruit Flies</i> and <i>Requirements for the establishment of areas of low pest prevalence</i></p>
3.	GENERAL COMMENTS	Canada	substantive	General	<p>There appears to have been a desire to push this standard forward for adoption, in spite of obvious deficiencies within the text. Indeed, the Report of the Chair of the Standards Committee (CPM 2007/INF/5) confirms this (para. 14 of the report: “It [the SC] had started the review of the draft ISPM on establishment of areas of low pest prevalence for fruit flies (<i>Tephritidae</i>) but had not completed it.”). This absence of complete review by the SC is abundantly apparent in the quality of the resulting text. This standard is simply not ready for adoption by the CPM and Canada suggests it be withdrawn and returned to the Technical Panel for Fruit Flies. Attempting to push it through without taking time to improve the text will set a poor precedent and will result in missing the opportunity to present clear, useful guidance on ALPPs for fruit flies.</p>	<p>The use of areas of low pest prevalence in phytosanitary measures, systems approaches, etc., is relatively new in the world of plant health. Even though a general standard or ALPP has been approved, this standard warrants more careful examination and consideration before its adoption, as the use of ALPPs is potentially a very important concept.</p> <p>This standard requires a lot of general editing work; some references to other standards do not add guidance or clarification, there is terminology which has not been used in previous standards and the meaning of which is unclear (e.g. “technical factors” and “supervision activities”), and there are errors which are obvious even for someone with no expertise in fruit fly management. In the absence of a standard on fruit fly control measures or specific fruit fly eradication procedures, which are related to ALPPs, the usefulness of this FF-ALPP standard in its current form is doubtful. In recognizing the importance of the subject of this standard, Canada would like to see the value of the resultant text maximized by careful review and revision, followed by utilizing the standard-setting process, including full review by the SC.</p>

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						For information, significant problems that Canada has noted within the draft text are presented below. This information is for consideration in the ongoing work on this text, and should not be seen as support for a revised version of this text to be considered at CPM-2, given the extent of changes required and the resultant need for consultation.
4.	GENERAL COMMENTS	Australia	substantive		Query the appropriateness of using the terms “ primary ” and “ secondary ” hosts in the context of this ISPM. Suggest providing definitions for these terms and for any other host types listed in the document or amending as suggested below	
5.	GENERAL COMMENTS	Australia	editorial	whole document	Consistency of reference to other ISPM's needs to be ensured (not just in this draft ISPM but in others released for consideration of CPM2). That is, is it ISPM # (name, date) or ISPM # (name), etc Consistent use of “e.g.” or “for example”. For example, section 1.1 fourth para, 1 st sentence uses “e.g.” and section 1.5 first para first sentence uses "for example,”.	
6.	GENERAL COMMENTS	Australia	editorial		There should be an increased recognition of the bilateral nature of recognition of ALPPs throughout the document. For example, in section 2.1.1 the first sentence "For every FF-ALPP a specific level of low pest prevalence must be determined." If the standard is to be used for gaining market access then wouldn't an acceptable level of pest prevalence need to be determined with the importing country?	
7.	SPECIFIC COMMENTS	Canada	substantive	General	This standard is not ready for adoption by CPM and Canada suggests it be withdrawn and returned to the Technical Panel for Fruit Flies.	General comments are provided above and under individual section comments below. The standard should provide more specific technical information on Tephritidae fruit flies. In its current form, it does not really add significant guidance beyond what is already provided in ISPM No. 22, <i>Requirements for the establishment of areas of low pest prevalence</i>
8.	SPECIFIC COMMENTS	Australia	editorial	contents list	needs to consistency with headings in text and contents eg 2.2.2	
9.	SCOPE	Australia	editorial	para 1, sentence 1of low pest prevalence for fruit flies that may then . These areas may be used as a pest risk management measure.....	Clarity
10.	SCOPE	New Zealand	Substantial		Delete “...that may be use asin an area.”	This scope is not to explain an ALPP. This is done in ISPM 22.

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11.	SCOPE	Korea (Rep.)	Technical	Sentence 1	This standard provides guidelines for the establishment and maintenance of areas of low pest prevalence for fruit flies that may be used as a pest risk management measure primarily to facilitate trade of fruits or to limit the impact of fruit flies in an area.	“Facilitation of trade” is not appropriate to the purpose of a standard developed under IPPC
12.	REFERENCES	New Zealand	Editorial	Line 5 International Plant Protection....		Move to under Guidelines on lists of regulated pests to maintain alphabetical order
13.	OUTLINE OF REQUIREMENTS	Canada	Editorial Substantive		The general requirements for establishment and maintenance of an area of low pest prevalence for fruit flies (FF-ALPP) include: - determination <u>of the area</u>	The full wording for the abbreviation is described in the previous section and does not need to be repeated. “determination” standing alone like this is rather meaningless. Determination of what? The “area” is probably the appropriate qualifying word.
14.	OUTLINE OF REQUIREMENTS	New Zealand	Editorial		The general requirements for establishing and maintaining an area of fruit fly-low pest prevalence (FF-ALPP) include: - the management elements of the system (documentation and review systems, record keeping) - supervision activities The major elements of the FF-ALPP are: - characterisation of the FF-ALPP - establishment and maintenance of the FF-ALPP General procedures for the characterisation of an ALPP are described in section 2.1 of ISPM No.22 (<i>requirements for the establishment of areas of low pest prevalence</i>). Other elements for consideration are included in Annex 1. Additional elements include corrective action planning, suspension of FF-ALPP status, reinstatement and loss of status. Corrective action planning is described in Annex 1.	Rewrite to align format more closely with ISPM No.26

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
15.	OUTLINE OF REQUIREMENTS	Australia	editorial	para 1 1 st dash point	- determination of an FF-ALPP	consistency with headings for sections 1.1 and 1.4
16.	OUTLINE OF REQUIREMENTS	Australia	editorial	para 1 3 rd dash point	- establishment of the parameter used to estimate the level of fruit fly prevalence and the efficacy of trapping devices for surveillance	consistency with text in next para
17.	OUTLINE OF REQUIREMENTS	Australia	editorial	para 1 4 th dash point	- documentation and review record keeping	consistency with headings for sections 1.1 and 1.4
18.	OUTLINE OF REQUIREMENTS	USA	Editorial	Fourth indent	Delete “review” and add “record keeping”	To be consistent with the rest of the draft headings.
19.	OUTLINE OF REQUIREMENTS	USA	Editorial	Second paragraph, first sentence	Change “a parameter” for “the parameter” or use the plural “parameters”	More accurate
20.	BACKGROUND	New Zealand	Substantial	Para 1 Sentence 2	Delete	It is not necessary to define ALPP. Done in earlier standard.
21.	BACKGROUND	Japan	Substantive	Para 1, sentence 3	The concept and provisions of areas of low pest prevalence are described in ISPM No. 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>) and describes different types of ALPPs and provides general guidance on the establishment of ALPPs. ALPPs may <u>also</u> be used as part of a systems approach (see ISPM No. 14: <i>The use of integrated measures in a systems approach for pest risk management</i>).	To make the description of ISPM No. 22 clear and to keep consistency among ISPMs, the description should be aligned with the description of ISPM No. 4 and the BACKGROUND of ISPM No. 26.
22.	BACKGROUND	Canada	editorial	1 st paragraph	approach (see as described in ISPM No. 14: <i>The use of integrated measures in a systems approach for pest risk management</i>).	As per decision of the SC, direct instructions to the reader to “see” other documents should not be used.
23.	BACKGROUND	New Zealand	Substantial	Para 2	Delete	Second sentence is not English .. and the whole paragraph is not needed. You would not be looking at this standard if you did not know that fruit flies were important.
24.	BACKGROUND	Canada	Substantive	2nd paragraph	None suggested, because information from fruit fly experts is required to improve the section. The whole paragraph needs to be edited as it is not clear.	The second paragraph is not at all clear.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
25.	BACKGROUND	Australia	editorial	para 2, sentence 1 & 2	Fruit flies are a very important group of pests for many countries because of their potential to cause damage to fruits-plant products and restrict access to international markets for plant products that can host fruit flies. The high probability of introduction of fruit flies associated with a wide range of hosts results in restrictions imposed by many importing countries to accept fruits-plant products from areas in which these pests are established.	Fruit flies potentially infected a wider range of commodities than just "fruits" (for example, cucurbits) and rather than using the term "fruit and vegetables" the term plant products is already defined. It is acknowledged however that the vast majority of potential hosts are "fruits".
26.	BACKGROUND	New Zealand	Substantial	Para 3	Delete	There is no need to justify this standard. This is unnecessary.
27.	BACKGROUND	New Zealand	Substantial	Para 4	Delete	This statement adds nothing to the standard and should be deleted.
28.	BACKGROUND	Canada	Technical	Fourth paragraph	The decision to establish an FF-ALPP is <u>may be</u> closely linked to market access as well as to economic and operational feasibility.	The absolute statement that ALPPs <u>are always</u> linked to market access as well as conditions of feasibility should not be made. It is possible that there may be other reasons.
29.	BACKGROUND	Australia	editorial	para 5, sentence 1	Areas of low pest prevalence for fruit flies (FF-ALPPs) may occur naturally,	consistency of use of FF-ALP – don't spell out
30.	BACKGROUND	Australia	editorial	para 5 sentence 1	by a National Plant Protection Organization (NPPO) in an...	first use of NPPO
31.	BACKGROUND	Japan	Substantive	Para 5	Areas of low pest prevalence for fruit flies (FF-ALPPs) may occur naturally, or may be the result of the application of phytosanitary measures by an NPPO in an area that is a buffer zone protecting a FF-PFA, or a fruit fly free place of production or production site. In other instances, FF-ALPPs may be component stages of a fruit fly eradication process or the objective of a suppression programme.	This should be a part of 1.General Requirements. ALPP is not always a buffer zone.
32.	1. General Requirements	New Zealand	Editorial	Paragraphs 1-5	1. General requirements	<u>Formatting changes to align with ISPM 26 Paragraphs 1-5 under the heading of General Requirements</u>

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
33.	1. General Requirements	Canada	Substantive	2 nd paragraph	The decision to establish a formal FF-ALPP may be based on the technical factors provided in this standard. They include components such as pest biology and control methods.	<p>This sentence under General Requirements is meaningless – the “decision” to establish a FF-ALPP may be based on numerous factors (as per the example provided in the background); after the decision has been taken, the guidelines in this standard describe <u>how</u> the FF-ALPP is established and maintained. What does “technical factors” really mean? This term appears only once in other standards, also being a standard on fruit flies, and there is no explanation there or here as to its meaning in the context of this important sentence.</p> <p>In contradiction to the text presented in the 2nd paragraph, the standard does not give any information on pest biology.</p>
34.	1. General Requirements	Japan	New para between para 2 and para 3- Editorial	New para between para 2 and para 3	<u>Add: FF-ALPPs may be established in accordance with this ISPM under a variety of different situations. Some of them require the application of the full range of elements provided by this standard, others require the application of only some of these elements.</u>	It should be moved from section 1.1 Para 3, since this description seems general.
35.	1. General Requirements	Australia	editorial/substantive	para 3	<p>In areas where the fruit flies are naturally of low pest prevalence, the status should be recognized according to the first paragraph of section 3.1.1 of ISPM No. 8 (<i>Determination of pest status in an area</i>).</p> <p>OR IF NOT DELETED, REWORD: In areas where the fruit flies are naturally of low prevalence, the status may be recognised in accordance with the examples listed in section 3.1.1 of ISPM No. 8 (<i>Determination of pest status in an area</i>).</p>	<p>It is repeated at the end of 1.1. If not deleted see comments regarding 1.1.</p> <p>Section 3.1.1 of ISPM No. 8 is a list of examples "<i>If a pest is present and sufficient reliable records are available, then it <u>may</u> be possible to characterise its distribution using phrases, or a combination of phrases, such as the following examples:</i>"</p> <p>The use of "should" in the draft text implies a "moral or political commitment" that something will be done (CPM1 report 11.5.1) and this cannot/should not be the case if it is referring to an example (all list of examples).</p>

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
36.	1. General Requirements	Japan	Para 3 Substantive	Para 3	In areas where the fruit flies are naturally of low pest prevalence, <u>the target fruit fly population may be under a specified level of low pest prevalence without applying any control measures. In such cases, surveillance should be undertaken to validate the status</u> should be recognized according to the first paragraph of section 3.1.1 of ISPM No. 8 (Determination of pest status in an area).	Recognition is out of SCOPE of this standard on Establishment of ALPP for FF. Section 3.1.1 of ISPM No. 8 is not specific to “naturally of low pest prevalence”. Surveillance is necessary to validate that the population level is under a specified level even where the fruit flies are naturally of low pest prevalence.
37.	1. General Requirements	Japan	New para between new para 3 and para 4 – Substantive,	New para between new para 3 and para 4	See BACKGROUND Para 5	See BACKGROUND Para 5
38.	1. General Requirements	New Zealand	Editorial	Paragraphs 6	1.2 Public Awareness	Paragraph 6 under the heading of Public Awareness
39.	1. General Requirements	Australia	editorial	para 6 sentence 1	...participation of the public (especially the local community) in close proximity to the FF-ALPP and individuals	clarity
40.	1.1 Determination of an FF-ALPP	Canada	Substantive	Entire section	This section needs complete revision. No text is suggested, because information from fruit fly experts is required to improve the section.	ISPM No. 22 is a general standard for ALPP and therefore can possess very broad, more generic guidance. However, the standard on <u>FF</u> -ALPP should take every opportunity to provide specific information for fruit flies. Reflecting that aim, this section should describe specific biological traits of Tephritidae fruit flies relevant when establishing an FF-ALPP.
41.	1.1 Determination of an FF-ALPP	New Zealand	Editorial	Paragraph 2	1.1 Determination of a FF-ALPP Elements for consideration for the determination of an FF-ALPP are outlined in section 2.1 of ISPM No.26 (<i>Establishment of pest free areas for fruit flies</i>)	Keep paragraph 1 Change paragraph 2 Delete paragraph 3 Keep paragraph 4
42.	1.1 Determination of an FF-ALPP	Australia	substantive	para 2, 1 st dash point	- delimitation of the area (extension, detailed maps including an accurate description of the boundaries , or GPS coordinates showing the boundaries, natural barriers,	Accurate descriptions of PFA boundaries underpin compliance and enforcement activities. Boundary descriptions often legislated for to support these activities.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
43.	1.1 Determination of an FF-ALPP	Australia	substantive	para 2, 3 rd dash point	- location and abundance of primary; secondary and occasional and non-preferred hosts, including native host species to the area.	The definition of primary and secondary hosts is not applicable to fruit flies and should be avoided. Preferred and non-preferred are more commonly used and should be applied here. Otherwise an explanation of the terms ‘primary’ and ‘secondary’ hosts in this context is required. To effectively access the risk, the relevance of native host species to the maintenance of ALPP is critical. However, the distribution of native species may be harder to ascertain.
44.	1.1 Determination of an FF-ALPP	USA	Technical	Add a last indent	“Determination of host status of commodities to be exported from the ALPP”	Needed information
45.	1.1 Determination of an FF-ALPP	Japan	Para 3-Editorial	Para 3	See New para between para 2 and para 3 above	
46.	1.1 Determination of an FF-ALPP	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	4 th para	In areas where prevalence of fruit flies is naturally at a low level because of climatic, geographical or other reasons (e.g. <u>secondary or occasional resistant</u> hosts/varieties), low prevalence should be recognized according to	There is no host resistance for FF. Secondary and occasional is the language previously used in ISPM No. 26.
47.	1.1 Determination of an FF-ALPP	Japan	Para 4-Substantive	Para 4	In areas where prevalence of fruit flies is naturally at a low level because of climatic, geographical or other reasons (e.g. resistant hosts/varieties), <u>the target fruit fly population may be under a specified level of low pest prevalence without applying any control measures. In such cases, surveillance should be undertaken to validate the</u> low prevalence <u>should be recognized according to section 3.1.1 of ISPM No. 8 (Determination of pest status in an area).</u> If, however, the fruit flies are detected above the specified level, because of extraordinary climatic conditions or other reasons, corrective actions should be applied.	See section 1, para 3

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
48.	1.1. Delimitation of an FF-ALPP	Australia	substantive /editorial	para 4 sentence 1	In areas where prevalence of fruit flies is naturally at a low level because of climatic, geographical or other reasons (e.g. resistant hosts/varieties), low prevalence status may should be recognised in accordance with the examples listed in according to section 3.1.1 ISPM No. 8 (<i>Determination of pest status in an area</i>).	"should" implies; according to CPM1 report, section 11.5.1: "should" Means a type of moral or political commitment.
49.	1.1. Delimitation of an FF-ALPP	Australia	substantive	para 4 sentence 2	If, however, the fruit flies are detected above the specified level, because of extraordinary climatic conditions or other reasons, corrective actions should must be applied	Corrective actions must be undertaken, unless the FF-ALPP is being abandoned; 'should' implies discretion.
50.	1.1.1 Delimitation of the area	New Zealand	Editorial	Title	2.1.2. Geographic description 2.1.3 Documentation and verification The NPPO should verify and document all procedures implemented elements of which are described in ISPM No.22 (<i>Requirements for the establishment of areas of low pest prevalence</i>)	Move to Specific Requirements and rename Geographic description to align with ISPM no. 22 (<i>see below</i>) Create new heading for Documentation and verification
51.	1.1.1 Delimitation of the area	Japan	Substantive	Para 1, sentence 2	In most cases, FF-ALPPs do not require isolation.	FF-ALPPs may require isolation depending on the purpose and situation.
52.	1.1.1 Delimitation of the area	Australia	substantive	para 2 sentence 1	Boundaries used to describe the delimitation of the FF-ALPP should be closely related to the relative presence of major preferred hosts of the target fruit flies	more appropriate and consistency in terminology
53.	1.1.1 Delimitation of the area	Australia	substantive	para 2 sentence 1	Boundaries used to describe the delimitation of the FF-ALPP should be established and closely related to the relative presence ...	Boundaries of FF-ALPP should be accurately determined through description and/or legislation.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
54.	1.2 Operational plans	Canada	Substantive	Whole section	Section needs complete revision. No text is suggested, because information from fruit fly experts is required to improve the section.	ISPM No. 22 is a general standard for ALPP. However, this standard on FF-ALPP should take every opportunity to provide specific information for fruit flies. This section should describe any fruit fly specific phytosanitary procedures which should be covered in an operational plan. In what ways might fruit-fly related operation plans differ from generic models? This standard must explain this.
55.	1.2 Operational plans	New Zealand	Editorial		1.3 Operational Plans	Change Operational plans to 1.1
56.	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	New Zealand	Editorial		Annex 2.	Move to Annex 2 following paragraphs 1-5 from 2.1.1 Determination of the specified level of low prevalence.
57.	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	Canada	Substantive	Title	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	The section describes which parameters are most commonly used; it does not describe how to establish them.
58.	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	USA	Editorial	First paragraph, first sentence	Change “should” to “shall”	It is stronger wording.
59.	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	Canada	Editorial	1 st paragraph	number of fruit flies per trap per day (FTD)	The full wording for the abbreviation is described in a previous section and does not need to be repeated.
60.	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	Canada	Editorial	1st paragraph, last sentence	More precise spatial data may be presented on the basis of trap density (i.e. FTD per unit area) or temporally for each trap present in an area over time (see reference further information is provided in Appendix 1).	As per Standards Committee agreements, direct instructions to the reader to “see” another text or section will not be used. Instead, such references should be indirect. In addition, this reference is related to a document referenced in an appendix which is somewhat confusing. It would be easier simply to refer to appendix I.
61.	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	Australia	substantive	para 2	<i>An explanation is required as this is a significant point relating to purpose of the ALPP and acceptable level established by the authority to receive the benefit/set tolerance of pest prevalence</i>	How does larval infestation equate to low pest prevalence? – the occurrence should indicate outbreak criteria have been met and FF-ALPP status is suspended for the entire area or part of it.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
62.	1.3 Establishment of the parameters used to estimate the level of fruit fly prevalence	Australia	editorial	para 3 sentence 3	It is used as provides baseline information to compare fruit fly populations among different place and /or times.	improved clarity
63.	1.4 Documentation and record keeping	New Zealand	Editorial		1.3 Documentation and record keeping	Change documentation and record keeping to 1.3
64.	1.4 Documentation and record keeping	Canada	Substantive	1 st paragraph	The phytosanitary measure procedures used for the determination, establishment, verification and maintenance of an FF-ALPP should be adequately documented as part of the phytosanitary procedures.	Phytosanitary measures are used to prevent the introduction and spread of quarantine pests, not to verify and maintain FF-ALPP
65.	1.4 Documentation and record keeping	Australia	editorial	para 1 sentence 2	They should be reviewed and updated regularly, including corrective actions; if required (as described in ISPM No.22....	delete comma as 'if required' is part of the phrase 'including corrective actions'
66.	1.4 Documentation and record keeping	Australia	substantive	para 1 sentence 3	It is recommended essential that a manual of standard operating procedures is prepared for the FF-ALPPP.	This is a complex concept and really needs to be supported by the SOP system
67.	1.4 Documentation and record keeping	Australia	substantive	para 2 1 st dash point	d) list of hosts known to occur in the area, including description of host fruit production in area	completeness of records
68.	1.5 Supervision activities	New Zealand	Editorial		1.5 Supervision activities	Change Supervision activities to 1.4
69.	1.5 Supervision activities	Canada	Substantive Substantive	Title Whole section	Supervision activities <u>Delegation of authorities.</u> Section needs complete revision. No text is suggested, because information from fruit fly experts is required to improve the section.	The text of the section does not describe any supervision, e.g., who supervises who and what gets supervised, etc. The reason for this section needs to be better explained.
70.	2.1 Procedures to establish an FF-ALPP	New Zealand	Editorial	Title	2.1 Establishment of the FF-ALPP Elements for consideration when establishing a FF-ALPP are described in section 2.1 and 2.2 of ISPM No. 26 (<i>Establishment of pest free areas for fruit flies</i>).	Change title Rewrite
71.	2.1 Procedures to establish an FF-ALPP	Australia	editorial	para 1 1 st dash point	- determination of the specified level of low pest prevalence	clarity
72.	2.1 Procedures to establish an FF-ALPP	Australia	editorial	para 1 2 nd dash point	- surveillance system to validate low pest prevalence	clarity

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
73.	2.1 Procedures to establish an FF-ALPP	Australia	substantive	para 1 3 rd dash point	- trapping materials (traps, attractants) and procedures where applicable	It is not necessary to reduce populations that are already below the FF-ALPP level specified, as the risk is factored into the determination of the agreed level
74.	2.1.1 Determination of the specified level of low prevalence	New Zealand	Editorial	Rewrite all paragraphs	2.1.1 Determination of the specified level of low prevalence Specified levels of low prevalence will depend on the level of risk associated with the target fruit fly species-host-area interaction. These levels should be established by the NPPO of the country where the ALPP is located with sufficient precision to allow assessment of whether surveillance data and protocols are adequate to determine that pest prevalence is below these levels. Establishment of the parameters used to estimate the level of fruit fly prevalence is described in Annex 2.	Very lengthy description – need to rewrite to align with ISPM No. 22 Create Annex 2 with parameters used to estimated the level of fruit fly prevalence with paragraphs 1-5 from original text.
75.	2.1.1 Determination of the specified level of low prevalence	Canada	Substantive	Entire section	No text suggested – needs careful rewording by experts	Surely economic considerations and the ultimate end objective for the fruit are what <u>determine</u> the specified low pest levels (this concept should introduce the section). This section also appears to confuse the factors leading to determination of the appropriate levels with limitations on relating such specified levels with monitored FTD values.
76.	2.1.1 Determination of the specified level of low prevalence	Canada	Substantive	Second paragraph, first sentence	The information provided in the second paragraph (below) runs counter to logic and should be reviewed carefully. Usually higher parameter values are used for secondary hosts of the target fruit fly species and lower parameter values are used for primary hosts of the target fruit fly species.	If primary hosts are the preferred hosts for a given fruit fly species then it would be assumed that, if both primary and secondary hosts exist in a given area, the fruit fly will be more likely to be found on the primary (preferred) host, and less likely to be found on the secondary (non-preferred) host. In this scenario, numbers of fruit flies would be expected to be higher on primary hosts and lower on secondary hosts. This being the case, why would higher parameter levels be used for secondary hosts, on which levels of fruit flies would be expected to be lower? Given the preference of fruit flies for the primary host, one would expect parameter levels to be <u>lower</u> on <u>secondary</u> hosts because the finding of fewer fruit flies on such hosts may have the same significance as the finding of a larger number of fruit flies on a primary host (e.g., in a

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						given ALPP, 3 fruit flies of a certain species on a primary host might have the same significance as finding 1 fly on a secondary host, because these levels, reflecting the preference of the pest for the types of hosts, could be equally indicative of the overall level of the fruit fly in the area). The sentence therefore appears to present the concept in completely the wrong way, unless “parameter value” has a special meaning. What is a “parameter value” anyway? This strange term is not explained anywhere in this standard, nor does it appear in other ISPMs. This section requires careful expert review.
77.	2.1.1 Determination of the specified level of low prevalence	Australia	substantive editorial	para 3 sentence 2	The rationale is that different trap efficiencies could lead to different FTD values at the same location for a given population , so that they have a significant effect in measuring the prevalence level of the target fruit fly species.	improve clarity of rationale delete ‘that’ as unnecessary
78.	2.1.2 Surveillance system	New Zealand	Editorial	Title paragraph 1	2.1.3 Surveillance activities prior to establishment 2.2 Phytosanitary procedures 2.2.1 Surveillance activities Surveillance should be conducted according to protocols for the specified fruit fly species.	Title to align with ISPM No. 22 Include Paragraph 1 only under this heading Include paragraphs 2-6 below Surveillance activities
79.	2.1.2 Surveillance system	Australia	editorial substantive	para 5 sentence 1	The presence and abundance of fruit fly hosts should be recorded separately, identifying commercial and major preferred non-commercial hosts	insert comma more appropriate terminology
80.	2.1.3 Reduction of the target fruit fly species levels	New Zealand	Editorial	Title	2.2.2 Reduction and maintenance of the target fruit fly species levels	Rewrite to align with ISPM No.22

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
81.	2.1.3 Reduction of the target fruit fly species levels	Canada	Substantive	2 nd paragraph	Phytosanitary measures to suppress fruit fly populations in FF ALPPs include a number of preventive and/or corrective control methods, selected and combined into a strategy for suppression. Efforts should be made to select those measures with least environmental impact.	The first sentence of the 2 nd paragraph simply duplicates the sense of the first paragraph but the first paragraph is in fact more accurate and correct (i.e., phytosanitary measures are not used to suppress fruit fly populations). The last sentence of the 2 nd paragraph can be combined with the first paragraph.
82.	2.1.3 Reduction of the target fruit fly species levels	New Zealand	Editorial	Paragraph 2, sentence 2	Suppression of fruit fly populations may involve the use of more than one control option described in section 3.1.4.2 ISPM No. 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>)	Include Paragraphs 1 with addition to sentence 2 and include paragraph 2
83.	2.1.3 Reduction of the target fruit fly species levels	Australia	editorial	para 2 sentence 2	Efforts should be made to select those measures with least environmental impact.	
84.	2.1.3 Reduction of the target fruit fly species levels	New Zealand	Editorial	Delete paragraph 3		Delete paragraph 3
85.	2.1.3 Reduction of the target fruit fly species levels	Canada	Substantive	3 rd paragraph	- physical control (e.g. fruit bagging)	Fruit bagging will do nothing to reduce the levels of fruit flies in an <u>area</u> , it may only reduce the level of infestation in the individual fruit that is protected in this manner. (The use of fruit-bagging appears to be described correctly as it appears in section 2 of Appendix 2.)
86.	2.1.3 Reduction of the target fruit fly species levels	Australia	substantive	para 3 dash point 5	—mass trapping	Either delete or define ‘mass trapping’. Mass trapping systems would be rarely applicable to fruit flies.
87.	2.1.4 Reduction of the risk of entry of the target fruit fly species	New Zealand	Editorial	Title	2.2.3 Reduction of the risk of entry of the target fruit fly	Rewrite to align with ISPM No.22
88.	2.1.4 Reduction of the risk of entry of the target fruit fly species	New Zealand	Editorial	paragraph 1	Phytosanitary measures may be required to reduce the risk of entry of the specified pests into the FF-ALPP. These are outlined in Section 3.1.4.3 of ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>)	Rewrite to align with ISPM No.22

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
89.	2.1.5 Domestic declaration of low pest prevalence	New Zealand	Editorial	Title	2.2.4 Domestic declaration of low pest prevalence	
90.	2.1.5 Domestic declaration of low pest prevalence	Australia	substantive	para 1 sentence 2	The NPPO should declare and notify appropriate stakeholders of the establishment of the FFALPP.; as appropriate	A specific entity should be notified rather than just declaring and notifying 'as appropriate' is not defined – should be by bilateral agreement
91.	2.2 Maintenance of the FF-ALPP	New Zealand	Editorial	Title	2.3 Maintenance of the FF-ALPP	Re-numbered title
92.	2.2 Maintenance of the FF-ALPP	Australia	substantive	para 1	Must include reference to INCLUDING AUDITING	Audit program to ensure ongoing compliance with agreed standards and procedures.
93.	2.2.1 Surveillance	New Zealand	Editorial		2.3.1 Surveillance activities In order to maintain the FF-ALPP status, the NPPO should continue surveillance, as described in section 2.1.3 of the present standard	Change section numbers
94.	2.2.1 Surveillance	Australia	substantive	para 1	In order to maintain the FF-ALPP status, the NPPO should must continue surveillance as described in section 2.1.2 of the present standard.	Surveillance activities must be undertaken; 'should' implies discretion.
95.	2.2.1 Surveillance	Canada	Editorial	End of paragraph	In order to maintain the FF-ALPP status, the NPPO should continue surveillance, as described in section 2.1.2 of the present standard.	Appending "of the present standard" in this way is unnecessary (and reads poorly).
96.	2.2.2 Measures to establish and maintain specified levels of fruit fly	New Zealand	Editorial		2.3.2 Measures to establish and maintain specified levels of fruit fly The NPPO should ensure that the control measures are applied to maintain the FF-ALPP as described in section 2.2.2	Change section numbers
97.	2.2.2 Measures to establish and maintain specified levels of fruit fly	Japan	substantive	Title	Measures to establish and maintain specified levels of fruit fly	Measures to establish are described in section 2.1.3, 2.1.4
98.	2.2.2 Measures to establish and maintain specified levels of fruit fly	Canada	Technical	title	Measures to establish and maintain specified levels of fruit fly	The paragraph describes measures to maintain specified levels only, not how to establish them, which is described elsewhere (in sections 2.1.1 and 2.1.3)

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
99.	2.2.2 Measures to establish and maintain specified levels of fruit fly	Japan	substantive	Para 1	<u>In most case, The NPPO should ensure that the control measures as described in section 2.1.3 may need to be</u> are applied to maintain the FF-ALPP <u>since the target fruit flies are still present in the established area as described in section 2.1.3.</u>	The control measure is not always necessary to be applied for establishment and maintenance of ALPP where the fruit flies are naturally of low pest prevalence.
100.	2.2.2 Measures to establish and maintain specified levels of fruit fly	Australia	substantive	para 2 insert new sentence at end of para	This threshold should be set to provide adequate warning of potentially exceeding the specified low pest prevalence level and avert suspension.	The threshold needs to provide ample opportunity to reduce the population before it exceeds the specified low prevalence level
101.	2.2.2 Measures to establish and maintain specified levels of fruit fly	Japan	substantive	New para after last para	<u>Add: The phytosanitary measures provided in Section 2.1.4 should also be applied at this stage to reduce the risk of entry of the specified pests into the FF-ALPP</u>	The measures provided in Section 2.1.4 are necessary for maintenance.
102.	2.2.3 Corrective action plans	New Zealand	Editorial	Sentence 2	2.3.3. Corrective action plans	Change section number
103.	2.2.3 Corrective action plans	Canada	Substantive	Whole section	The entire section 2.2.3 is incorrectly contained within a section on <u>maintenance</u> (as explained to the right) and must be moved and properly incorporated into section 2.3. There is also a need for further information to be presented on how, if the population levels of the target fruit fly surpasses the specified low prevalence level, the FF-ALPP is suspended and can only be re-instated once the corrective action plan has been successfully applied and the specified low prevalence level maintained (and not again exceeded) for a specified period of time, appropriate for the biology of the fruit fly species and other relevant parameters.	<p>The application of corrective action plans is part of the process of loss, suspension or reinstatement of FF-ALPPs. As the text of section 2.2.3 itself states, “A <i>corrective action plan for the FF-ALPP should be applied by the NPPO when the population level surpasses the specified fruit fly low prevalence level.</i>” In such cases, application of such plans can not be considered as “maintenance” of the area, which is what section 2.2 relates to, because by definition it is no longer an ALPP (its level is surpassed).</p> <p>When this text is added to section 2.3, either being incorporated into section 2.3.1 or as part of a separate subsection on corrective action plans, it should also include information on how, if the population levels of the target fruit fly surpasses the specified low prevalence level, the FF-ALPP is suspended and can only be re-instated once the corrective action plan has been applied and the specified low prevalence level maintained (and not again exceeded) for a specified period of time, appropriate for the biology of the fruit fly species and other relevant parameters.</p>

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
104.	2.2.3 Corrective action plans	Australia	editorial	para 1 sentence 1	A corrective action plan for the FF-ALPP should be applied by the NPPO when the population level surpasses exceeds the specified fruit fly low prevalence level	improved clarity
105.	2.3 Suspension, reinstatement and loss of FF-ALPP status	New Zealand	Editorial	Title-	2.4 Suspension, reinstatement and loss of FF-ALPP status	Change section number
106.	2.3 Suspension, reinstatement and loss of FF-ALPP status	Canada	Substantive	All sections	Subsections on suspension and re-instatement should be reviewed and amended. Specific rewording is not suggested, because information from fruit fly experts is required to improve the section	Subsections on suspension and re-instatement should be reviewed and amended, in view of the fact that the section on corrective action plans should be included here.
107.	2.3.1 Suspension of FF-ALPP status	New Zealand	Editorial	Title	2.4.1 Suspension of FF-ALPP status	Change section number
108.	2.3.1 Suspension of FF-ALPP status	USA	Technical	First paragraph, first sentence	If the low pest prevalence specified level of the target fruit fly species is exceeded in “the whole FF-ALPP area or a sector within the whole FF-ALPP area”...	The whole FF-ALPP area could be suspended, not only a piece of the ALPP area
109.	2.3.2 Reinstatement	New Zealand	Editorial	Title Paragraph 1	2.4.2 Reinstatement	Change section number
110.	2.3.2 Reinstatement	Australia	editorial	para 1	Reinstatement of FF-ALPP status may take place when: - when the population level reaches... - when non-compliance to procedures....	clarity
111.	2.3.2 Reinstatement	USA	technical	First indent	Use the original wording that went for country consultation, “in the case where the low pest prevalence level is exceeded, only after the conditions for establishment of the FF-ALPP have again been achieved”	It is clearer, more concise
112.	2.3.2 Reinstatement	Australia	substantive	para 2	Once technical conditions are achieved again, through the application of corrective actions contained in the plan, recognition of reinstatement should be carried out without undue delay is automatic.	The process of reinstatement is automatic once a technical criterion is met.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
113.	2.3.3 Loss of status	New Zealand	Editorial	Title	2.4.3 Loss of FF-ALPP status	Change section number and title to align with ISPM No 26
114.	2.3.3 Loss of status	Australia	editorial	para 1 sentence 1	...or if critical failures in the procedures occur and the integrity of the system is unlikely to be verified restored , then loss of FF-ALPP status should occur	clarity
115.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	New Zealand	Substantive		Add section on suspension as per ISPM 26. Amend that section for this standard.	In ISPM 26 there is mention in the text and the corrective action section of suspension. In this standard there is no mention in the corrective action section. This should be added.
116.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	Editorial/technical	First paragraph, first sentence	Delete “an outbreak with”. Also, change “superior to” to “higher than”.	The word outbreak is not used anywhere else in the draft
117.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	Editorial	para 1, sentence 1	..with a population level superior to exceeding the specified low prevalence level, ..	consistency – language used in other parts of standard
118.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	Substantive	para 1, sentence 3	Even though the corrective action may be undertaken in coordination with and with the support of the private sector, the NPPO is responsible for leading it. It is the responsibility of the NPPO to ensure that appropriate corrective action plans are developed.	NPPO will not necessarily lead this – in Australia, the state departments take the lead, not the NPPO There are cases where, for example, State/County authorities may be leading the corrective action. 1. <i>Declaration of an outbreak and first actions</i> (in Annex one) is inconsistent with the original text in that " <i>The NPPO, or an NPPO nominated agency, is responsible for supervising the implementation of corrective measures after the declaration of an outbreak.</i> "
119.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	para 2	The corrective action plan should be prepared taking into account the biology of the target fruit fly species, the geography of the FF-ALPP, climatic conditions, phenology, host distribution within the area, time of year and extent of the outbreak	completeness
120.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	Editorial/technical	Third paragraph, first bullet	Delete “outbreak”. Replace with “loss of status”.	The word outbreak is not used anywhere else in the draft

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
121.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	para 3 new dash point	The elements required for implementation of a corrective action plan include: - a detailed map and definition of the suspension area.	Maps describe clearly the area and level of industry affected by outbreaks etc
122.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	Editorial/technical	Application of the corrective action plan, 1. title	Delete “Declaration of an outbreak and first actions”. Replace with “Notice to implement corrective actions”.	The word outbreak is not used anywhere else in the draft
123.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Canada	Substantive	Application of the corrective action plan	Annex I requires a full revision. No rewording is suggested, because information from fruit fly experts is required to improve the section.	This section refers to “declaration of an outbreak” and “phytosanitary features of the outbreak”, while the standard itself refers to surpassing the specified fruit fly low prevalence level. Consistent terminology should be used. Furthermore, an Annex should not introduce new terminology or concepts, such as “phytosanitary features” of a fruit fly outbreak. This term does not appear in any other standards and is rather meaningless.
124.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	Editorial/technical	second sentence	Delete “after the declaration of an outbreak	The word outbreak is not used anywhere else in the draft
125.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	Editorial/technical	2. title	Delete and change to: “Determination of Phytosanitary Status”	The word outbreak is not used anywhere else in the draft
126.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	Editorial/technical	first sentence	Delete “outbreak”. Change to “immediately after detecting a population level higher than the specified low pest prevalence level...”	The word outbreak is not used anywhere else in the draft
127.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP <u>2. Determination of the phytosanitary features of the outbreak</u>	Australia	Editorial	para 1, sentence 1	Immediately after the detection of an outbreak, a delimiting survey, which includes the deployment of additional traps, and usually fruit sampling of major preferred -host fruits, as well as an increased trap inspection frequency, should be implemented to determine the size of the affected area and more precisely gauge the level of the fruit fly prevalence	consistency with previous editorials clarity

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
128.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP <u>3. Implementation of control measures in the affected area</u>	Australia	Editorial	para 1, sentence 2	Suppression actions may, as appropriate, Available methods include:	clarity
129.	Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP <u>3. Implementation of control measures in the affected area</u>	Australia	substantive	new dash point	- insecticide treatments (ground, cover)	As distinct from insecticide applications made in combination with bait (attractant)
130.	Appendix 2 Some uses of areas of low pest prevalence for fruit flies	Australia	editorial	heading	SOME USES APPLICATIONS OF AREAS OF LOW PEST PREVALENCE FOR FRUIT FLIES	Improved wording
131.	Appendix 2 Some uses of areas of low pest prevalence for fruit flies	Australia	editorial	para 1, 1 st dash point	- as a buffer zone for an FF-PFAs, fruit fly free places of production or fruit fly free production sites	plural, consistency with remainder of sentence
132.	1 An FF-ALPP as a buffer zone	Japan	Substantive	Sentence 1	In cases where the biology of the target fruit fly species is such that it is likely to disperse from an infested area into a protected area, it may be is necessary to define a buffer zone with a low fruit fly prevalence (as described in ISPM No. 26: <i>Establishment of pest free areas for fruit flies (Tephritidae)</i>).	Buffer zone is not always necessary, but it is an option which can be taken.
133.	1 An FF-ALPP as a buffer zone	Australia	substantive	para 1, sentence 2	These FF-ALPPs are usually established at the same time of as setting up establishing the FF-PFA and may be subsequently redefined to improve protection of the FF-PFA.	provides some flexibility after establishment
134.	1.1 Determination of an FF-ALPP as a buffer zone	Australia	editorial	para 1 sentence 1	Determining Determination procedures may includes those listed in section 1.1.	consistency

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
135.	1.2 Establishment of an FF-ALPP as a buffer zone	Australia	editorial	para 1, sentence 2	The movement into the area of regulated articles that can host the target fruit fly species may be regulated. The movement of relevant fruit fly host commodities into the area may need to be regulated.	clarify the requirement
136.	1.3 Maintenance of an FF-ALPP as a buffer zone	Australia	editorial	para 1 sentence 1	Procedures may include those listed in section 2.2.	remove unnecessary word
137.	2. FF-ALPPs for export purposes	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	Single para	FF-ALPPs may be used to facilitate fruit exports from the area. In most cases the FF-ALPP is the main component of a systems approach as a pest risk mitigation measure. Examples of measures and/or factors used in conjunction with FF-ALPPs include: - pre- and subprobit 9 post-harvest treatments - poor hosts,....	Probit 9 treatments should not have to be combined with ALPP requirements, because their efficacy is enough to mitigate risks.
138.	2. FF-ALPPs for export purposes	Korea (Rep.)	Technical	Indent 3	Export of the host material to areas not at risk during particular seasons	It is inappropriate example of measures to be used in conjunction with FF-ALPP. In many cases risk status is not changed with season, since cultivation is taken place regardless of season owing to developed cultivation technique these days
139.	2.2 Maintenance of an FF-ALPP for export purposes	Australia	editorial	para 1 sentence 1	Maintenance procedures may include those listed in section 2.2.	remove unnecessary word
140.	2.2 Maintenance of an FF-ALPP for export purposes	Australia	substantive	para 1 sentence 2	Surveillance and control measures should be applied throughout the fruiting seasons while hosts are available.	"Fruiting season" implies cyclical surveillance.
141.	2.2 Maintenance of an FF-ALPP for export purposes	Australia	editorial	para 1 sentence 4	This will depend on the biology of the target fruit fly species and its relationship with the major hosts that bear fruits present during the off-season period.	