



Regional workshop for the review of draft International Standards for Phytosanitary Measures Southwest Pacific Nadi, Fiji 18 -21 August 2008

Report

1. Opening of the session

The meeting began with the opening prayer conducted by Mr. Sevanaia Tawake of the Fiji Islands. Mr. Sidney Suma (Adviser & Coordinator, Biosecurity & Trade Support Land Resources Division, Secretariat of the Pacific Community SPC) began his opening remarks by welcoming all participants including the three IPPC Standard Committee members to Fiji. Mr. Suma stressed the opportunity this meeting provides in preparing comments to be sent to the IPPC Secretariat for the IPPC Standard Setting procedure. Mr John Hedley (Biosecurity New Zealand, Ministry of Agriculture and Forestry) also encouraged the participants to take a full part in the meeting. Mr. Matt Purea (FAO SAPA) also welcomed the participants and noted the efforts of the SPC Secretariat in setting up the meeting. All three standard committee members highlighted the fact that the workshop provided opportunities for Pacific Island member countries to discuss and review these draft international standards for phytosanitary measures which in turn improved member's understandings of the measures and potential implications on respective countries

The participants then introduced themselves.

The meeting was attended by 2 Standards Committee experts from New Zealand and Tonga and 15 country participants including seven participants from Fiji. Three member countries (New Caledonia, Vanuatu, and Niue) were unable to attend due to unforeseen circumstances. The meeting was facilitated by M. Purea and S. Suma of FAO SAPA and Secretariat of the Pacific Community (SPC) respectively and Secretariat and note taking services were provided by 2 officers from the PPPO Secretariat (SPC-LRD).

2. Purpose of the workshop

The FAO Regional Plant Protection Officer, Mr. Purea outlined that the main purpose of this workshop was to provide participants from countries in each FAO region with a regional forum to discuss the draft International Standards for Phytosanitary Measures (ISPMs). These discussions would help participants gain a better understanding of the national and regional impact of these proposed standards and provide a basis for the development and submission of national comments. This workshop covered the following draft ISPMs:

- Regulating wood packaging material in international trade (Revision of ISPM No. 15)
- Categorization of commodities according to their phytosanitary risk
- Fruit fly trapping (proposed Annex 1 to ISPM No. 26 (Establishment of pest free areas for fruit flies (Tephritidae))
- Glossary of phytosanitary terms (amendments to ISPM No. 5)
- Terminology of the Convention on Biological Diversity (CBD) in relation to the Glossary of phytosanitary terms (proposed supplement to ISPM No. 5)
- Structure and operation of post-entry quarantine facilities
- Pest free potato micropropagative material and minitubers for international trade

3. Overview of the IPPC

Mr. Purea gave an overview of the IPPC, ISPMs and the standard setting process. There was discussion on the scope of the IPPC, the history of the IPPC, the relationship of the IPPC and other international organisations, the Commission of Phytosanitary Measures (CPM) and the goals of the CPM, standard setting,

information exchange, technical assistance, dispute settlement etc. Lists of standards being developed were noted. Mr. Purea stressed the opportunities for countries to take part in the standard setting procedure. The forthcoming meeting in Wellington on WTO issues was mentioned. A number of Pacific countries have been involved in the application of the PCE. It was noted that this meeting is held to assist countries in the preparation of their comments on draft ISPMs. Official comments should be submitted to the IPPC Secretariat by the national IPPC contact point before the deadline of 30th September 2008.

4. Adoption of the agenda

Mr. Sidney Suma facilitated this session on the adoption of the Agenda. The agenda was discussed and adopted (see Appendix 1). Mr. Suma informed that the chairperson position was to be shared between M. Purea of FAO SAPA and S. Suma of SPC. It was also agreed that the reporting activities of the meeting sessions would also be shared. The Agenda and working time was agreed and adopted by the meeting.

5. Review of documents and discussion on draft ISPMs

The participants agreed that the best approach in carrying out the review of the draft ISPMs was to discuss these in the main group format (plenary session) to determine which comments were to be captured. The following five draft standards and amendments to the *Glossary* (ISPM No. 5) were reviewed and comments were recorded. The format on the Standard discussion started with the power point presentations which were presented by members of the Standard Committee. After each presentation the floor was opened for discussions and important comments were recorded. These viewpoints and comments were recorded directly onto the Templates as required. When discussing amendments to the drafts, the participants also referred to comments made by the Asian regional workshop on draft ISPMs, Anyang, Korea and to comments provided by Mr David Porritt, Senior Manager, Plant Biosecurity, Biosecurity Australia, Canberra, Australia.

The following sections captured the main discussion points for each of the draft ISPMs.

5.1 Regulating wood packaging material in international trade (Revision of ISPM No. 15)

The participants agreed that contaminating pest could be dealt with in another standard. The group agreed with the comments made by the Asian workshop that producer could be extended to producer/treatment provider. The use of palm material for matting as wood packaging material was discussed but no recommendation was considered necessary. The requirement for the MB treatment to be undertaken after bark removal was discussed and why this was not also a requirement for the heat treatment option. A suggestion for this was included in the template. The participants agreed that the information regarding methyl bromide paragraph 71 was not required and supported its deletion. The group also agreed with the addition of another option in paragraph 104.

5.2 Categorization of commodities according to their phytosanitary risk

The group suggested a new title "Categorisation of processed products relating to pest status and intended use". The group also proposed that the draft should include some considerations of the contamination by pests after processing.

The group considered the application of the draft as a standard, the general use of categorisation concerning the degree of procession and the intended use of the product. There was general confusion on the intent and use of the draft in its present state.

There was concern that this standard implied that measures could not be applied for the other areas of the pathway for a commodity entering a country. The group confirmed that the whole pathway must be considered in determining phytosanitary requirements and that phytosanitary actions can be taken for dealing with associated pest risks.

It was suggested that this subject is really a small part of PRA and should be treated as such. Where a product is processed so that it becomes pest free, then this makes the consideration of the commodity pest risk very rapid, and then the other aspects of the pathway can be examined.

The deviation of intended use was discussed at length and the considerations of SC7, from their May report, noted. The need for information on the nature of the processing was discussed.

The group discussed some of the treatments and came to the conclusion that a note should be provided to the effect that some of the treatments in Annex 2 will eliminate pest in certain conditions.

It was suggested that the flow chart be deleted as it really not necessary.

Finally, the group presented some general statements. The group decided not to support the introduction of the standard and suggested that if the information is to be used, it should be used as an annex to an existing standard.

5.3 Fruit fly trapping (proposed Annex 1 to ISPM No. 26 (Establishment of pest free areas for fruit flies (Tephritidae))

The group agreed with many of the editing comments submitted by other contributors.

The "eradication of incursion" paragraph 7 dash point 5 was found to be unclear and a rewording was proposed. The group proposed adding a number of major Pacific fruit flies to the list in Table 2. The listing of Cuelure for *Bactrocera cucumis* was questioned (see Drew and Hooper 1981). Another compound was added to the list of killing agents. A number of further editorial amendments were also proposed.

5.4 Glossary of phytosanitary terms (amendments to ISPM No. 5)

Participants discussed incidence and its relationship to prevalence and the use of prevalence within the term low pest prevalence. Likewise, the significance of emergency response actions was discussed in relation to corrective action plans. It was noted that the use of the word organism allowed the inclusion of pests such as insects, mites, fungi, bacteria etc to be include in the coverage of the term reference specimen.

5.5 Terminology of the Convention on Biological Diversity (CBD) in relation to the Glossary of phytosanitary terms (proposed supplement to ISPM No. 5)

Participants proposed that this document be submitted as an Explanatory paper rather than a supplement to ISPM No. 5. It was noted that the document was very detailed and that comment was made on the terms of another convention.

5.6 Structure and operation of post-entry quarantine facilities

The use of the major terms in the standard were questioned – facilities and containment. It was suggested that quarantine station and quarantine would be more accurate. The group felt that the draft should refer to plants (and include seeds) and not just plants for planting.

The use of terms was corrected in a number of places in the draft. Additions to the physical requirements of PEQ level 1, e.g. a moat, were proposed. The group agreed that generally equipment should not be removed from the station. Amendments were proposed for Table 1 of Annex 1 concerning the use of terminology in the headings.

A comment on the stations being restricted areas being accessible only to staff and authorised visitors, was added to apply to all levels as in Appendix 1. Further additions were proposed for the physical requirements listed in Appendix 1 including footpaths, fencing, moats, showers and signage.

A redraft of the draft standard prepared by MAFBNZ was briefly noted. There was general support for this redraft.

5.7 Pest free potato micropropagative material and minitubers for international trade

There was considerable discussion on the conflict of auditing by the NPPO or official auditing in paragraph's 24 and 29. The term protected environment was noted – it has been used in two other standards. It was proposed that section 4 be divided up into sections as per section 3. Standby facilities in case of emergencies were proposed for addition to Annex 3.

Technical and editorial comments were made on the draft ISPMs and these comments are attached to the report (see Annex III). Participants were invited to take note of the comments collected at this workshop and utilize these comments as they felt appropriate in their preparation of national comments. National comments

should be submitted through the NPPO contact point to the IPPC Secretariat no later than 15 September 2008 and participants were reminded to follow the *Instructions for the Use of the Template* (see Annex IV)

6. IPPC standard setting work programme and opportunities for participation in the standard setting process

The IPPC standard setting work programme was presented and the list of adopted ISPMs and topics for future ISPMs was discussed. Possibilities for input into the topics and priorities for standards already on the work programme and for future standards were outlined.

6.1 Call for work programme topics

The biennial call for new topics for the work programme will be made most likely in June 2009. Participants are encouraged to discuss priorities for future standards with their colleagues and be prepared to submit topics to the Secretariat.

6.2 Call for experts to take part in drafting ISPMs

The selection of experts for drafting ISPMs was discussed. A call for experts for expert working groups and technical panels is made after a topic has been included on the IPPC standard setting work programme. This year a call for nominations will be sent to NPPOs, RPPOs, SC members, CPM Bureau and posted on the IPP as a news item in August 2008. Participants were encouraged to check the IPP frequently and search for qualified experts from their region and submit their nominations, through the NPPO contact point, to the IPPC Secretariat. It was also requested that nominees follow the instructions in the call letter and ensure they submit CVs detailing the appropriate expertise and outlining specific experiences in relation to the requirements listed in the expertise section of the relevant specifications.

7. Progress reports by participants on the implementation of adopted ISPMs

No discussion was held regarding the implementation of adopted ISPMs.

8. Other issues

Discussion on TCPs

The discussion on the subjects for TCPs was led by Mr. Purea and Mr. Suma. It was noted that the TCPs should be related to food security (food pricing). It is necessary to develop a regional initiative for gender food security issues and possibly linked to biosecurity.

The development of projects from the PCE s that have been conducted are under consideration. The gaps identified by the PCE could be considered.

Regional standards could be considered. These could involve the movement of germplasm – particularly in response to emergencies. The movement of floriculture germplasm could be considered. Also a standard on the movement of bulk soil could be considered.

New Zealand Pacific strategy

Mr Hedley introduced the recently developed MAFBNZ Pacific strategy. This included the establishment of a Pacific Forum within MAFBNZ to coordinate the activities of MAFBNZ staff concerned with Pacific biosecurity. In the discussions it was noted that a further entry point of project ideas from regional organisation, such as SAPA, could be added to the flow diagram of the Forum's operation. Liaison with APEC could also be considered.

9. Next steps

Mr. Suma facilitated this session and participants were asked to share their views on the future running of regional workshops for the review of draft ISPMs. Mr. Suma outlined the important points and invited suggestions, comments, etc for open discussions.

9.1 Organization of future regional workshops on draft ISPMs

Solomon Islands and Palau expressed interest in hosting the next regional workshop on draft ISPM. Mr. Suma explained to them that the next regional workshop would be decided based availability of funding.

9.2 Funding of future workshops

Suggested elements of discussion:

- Ideas for how long-term funding can be secured for the workshops:
- Dealing with decreased resources
- Consideration of alternative sources of funding (The meeting suggested for the steering committee to start seeking)
- Lobbying for funding and resources for workshop and travel at national and regional levels
- Assistance of IPPC Secretariat to inform NPPOs of need of funding (The meeting supports for IPPC to continue its assistance where possible)

9.3 Topics for consideration at future workshops

The following topics were put forward for consideration for discussion at future workshop agenda items:

• No discussions were held with regard to the topics for consideration in the next workshop.

10. Date and location of the next meeting

The participants agreed that next year's meeting should be held around the same time as this year to ensure IPPC documents (Draft Standards, etc.) are ready prior to the meeting dates. Efforts would be made to find funding for a further meeting.

11. Close

Closing remarks were given by Mr. Suma, SPC. Participants were thanked for their valuable contributions and encouraged to coordinate the submission of national country comments to the Secretariat. The FAO subregional plant protection officer and Standards Committee representatives were also thanked for their special contribution. Mr. Suma, on behalf of the PPPO expressed his sincere appreciation to the SPC Land Resources Division Forests and Trees group, the Government of Australia and the Government of New Zealand for the funding the workshop. Finally, it was noted that experience and continuity were achieved by having the same person participate each year and the group benefited from the expertise of many different disciplines and experiences. The meeting closed at 1500 hrs on 21st August 2008.

Appendices:

Appendix 1: Agenda

Appendix 2: List of participants

Appendix 3: Completed templates with workshop comments on each ISPM





Regional workshop for the review of draft International Standards for Phytosanitary Measures (ISPMs) 18 – 21 August 2008 Tanoa International Hotel, Nadi, Fiji

	Monday – 18/08/08
08:30 - 10:30	 Registration Opening of the workshop Opening address (SPC) Overview of the workshop (FAO officer/SWP-SC member) Introductions Adoption of the agenda Election of chair and rapporteur Overview of the IPPC (FAO officer/SWP-SC member) Overview of the review of draft ISPMs (FAO officer/SWP-SC member)
11:00 – 12:30	Review and discussion of draft standards - Draft 1/7: Revision of ISPM No. 15 (Guidelines for regulating wood packaging material in international trade)
13:30 – 15:00	Review and discussion of draft standards - Draft 1/7 (continued): Revision of ISPM No. 15 (Guidelines for regulating wood packaging material in international trade)
15:30 – 17:00	Review and discussion of draft standards - Draft 2/7: Categorization of commodities according to their phytosanitary risk
18:30-19:30	Workshop Cocktail
	Tuesday – 19/08/08
08:30 - 10:30	Review and discussion of draft standards - Draft 2/7 (continued): Categorization of commodities according to their phytosanitary risk
11:00 – 12:30	Review and discussion of draft standards - Draft 3/7: Annex to ISPM No. 26 on fruit fly trapping
13:30 – 15:00	Review and discussion of draft standards - Draft 3/7 (continued): Annex to ISPM No. 26 on fruit fly trapping
15:30 – 17:00	Review and discussion of draft standards - Draft 4/7: Amendments to ISPM No. 5 (<i>Glossary of phytosanitary terms</i>)
	Wednesday – 20/08/08
08:30 - 10:30	Review and discussion of draft standards - Draft 4/7 (continued): Amendments to ISPM No. 5 (<i>Glossary of phytosanitary terms</i>)
11:00 – 12:30	Review and discussion of draft standards - Draft 5/7: Supplement to ISPM No. 5 on terminology of the Convention on Biological Diversity in relation to the <i>Glossary of phytosanitary terms</i>

13:30 – 15:00	Review and discussion of draft standards - Draft 5/7 (continued): Supplement to ISPM No. 5 on terminology of the Convention on Biological Diversity in relation to the <i>Glossary of phytosanitary terms</i>						
15:30 – 17:00	Review and discussion of draft standards Draft 6/7: Structure and operation of post-entry quarantine facilities						
18:30 - 20:30	Workshop Dinner						
	Thursday – 21/08/08						
08:30 – 10:30	Review and discussion of draft standards - Draft 6/7 (continued): Structure and operation of post-entry quarantine facilities						
11:00 – 12:30	Review and discussion of draft standards - Draft 7/7: Pest free potato micropropagative material and minitubers for international trade						
13:30 – 15:00	Review and discussion of draft standards - Draft 7/7 (continued): Pest free potato micropropagative material and minitubers for international trade						
15:30 – 17:00	Review and discussion of draft standards: - Review of agreed comments - Finalization of comment tables						
	Call for experts						
	- Next steps: Submitting national comments - Tentative dates for regional workshop for 2009						
	Close						

Note: Daily morning/afternoon tea and lunch time:
Morning tea: 10:30–11:00

Morning tea: 10:30–11:00 Lunch: 12:30–13:30 Afternoon tea: 15:00–15:30





Regional workshop for the review of draft International Standards for Phytosanitary Measures (ISPMs) 18 – 21 August 2008

Tanoa International Hotel, Nadi, Fiji

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Template for comments - Draft ISPMs for country consultation, 2008—Southwest Pacific/PPPO

DRAFT 1/7: REVISED ISPM NO. 15 - REGULATING WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE

See <u>instructions</u> on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS					Seems to state over and over again that packaging is subject to treatments in this standard "should be accepted by all NPPOs as the basis for authorizing the entry of WPM without further requirements" approxBUT also says that the treatments "reduce significantly the risk of spread and introduction of most quarantine pests" Seems to remove the right of a country to determine it own measures while most pests would be dealt with, some countries may, through tech justification, identify other QPs that are of concern	PPPO
SPECIFIC COMMENTS			Specific	ISPM 15 (section 1) notes that Countries should have technical justification for requiring the application of the approved measures as described in this standard for imported wood packaging material. Requiring phytosanitary measures beyond an approved measure as described in this standard also requires technical justification. This revision however appears to go against this basic IPPC right in numerous locations through the text stating that "should be the basis for authorizing the entry of wood packaging material		PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				without further requirements." (or something similar) but the revision also notes that the treatments "reduce significantly the risk of spread and introduction of most quarantine pests". The text noting the technical justification requirements should be re-inserted and the text around "without further requirements" should be softened.		
TITLE	[1]					
CONTENTS	[2]					
INTRODUCTION	[3]					
SCOPE	[4]					
SCOPE	[5]					
SCOPE	[6]				Noted that protection from contaminating pests is required. This could be dealt with in a future standard.	PPPO
REFERENCES	[7]			Add ISPM No. 28	Reference to treatments	PPPO
REFERENCES	[8]					
REFERENCES	[9]					
REFERENCES	[10]					
REFERENCES	[11]					
REFERENCES	[12]					
REFERENCES	[13]					
REFERENCES	[14]					
REFERENCES	[15]					
REFERENCES	[16]					
DEFINITIONS	[17]					
DEFINITIONS	[18]		Editorial	Definitions of phytosanitary terms used in this the present standard		

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
OUTLINE OF REQUIREMENTS	[19]					
OUTLINE OF REQUIREMENTS	[20]	1st sentence	Edit	"recognised marking as prescribed in Annex 2 of this standard."	Clarity	PPPO
OUTLINE OF REQUIREMENTS	[21]	2nd sentence 4th sentence	Edit	The National Plant Protection Organizations (NPPOs) register or accredit and audit companies that have been authorized to apply the treatments and to use the mark. Delete "without further phytosanitary import requirements"	Use words from the text and delete inspection – not that important. If the treatments are the "basis for authorizing entry of WPM" then it is possible that other requirements may be added. This is in line with the right to make import requirements if technically justified.	PPPO
REQUIREMENTS	[22]					
1. Basis for regulating	[23]					
1. Basis for regulating	[24]	2nd sentence 6th sentence	Edit Edit	"introduction of potential quarantine pests." Delete "that are approved and"	Not all pests are QPs. Redundant. If they are internationally accepted they are approved	PPPO
2. Regulated Wood Packaging Material	[25]				1	
2. Regulated Wood Packaging Material	[26]	Last line	Edit	Replace "the target of" with "subject to"	More common usage	PPPO
2.1 Exemptions	[27]					
2.1 Exemptions	[28]					
3. Phytosanitary Measures for Wood Packaging	[29]					
3.1 Approved phytosanitary measures	[30]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.1 Approved phytosanitary measures	[31]					
3.1 Approved phytosanitary measures	[32]					
3.1 Approved phytosanitary measures	[33]	1st sent, 3rd	Substantive	country and producer/treatment provider of the wood packaging material	In some countries the treatment provider produces the marked wood packaging.	PPPO
3.2 Approval of new or revised treatments	[34]					
3.2 Approval of new or revised treatments	[35]	End of sentence	substantive	(CPM) through the special process of the IPPC standard setting procedure.	For clarification of necessary procedures.	PPPO
3.3 Alternative requirements	[36]					
3.3 Alternative requirements	[37]	2nd sentence	substantive	In such cases where an ISPM No.15 is not applied, the mark shown in Annex 2 should not be used.	Clarity	PPPO
4. Responsibilities of NPPOs	[38]					
4. Responsibilities of NPPOs	[39]					
4.1 Regulatory considerations	[40]					
4.1 Regulatory considerations	[41]					
4.1 Regulatory considerations	[42]					
4.2 Marking	[43]					
4.2 Marking	[44]					
4.3 Treatment and marking requirements	[45]					
4.3 Treatment and marking requirements	[46]	Last line	editorial	Add(see 2.1 dashpoint 2)	If no addition you do no know what processed wood material is.	PPPO

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
•••						
4.3.1 Reuse of wood packaging material	[47]					
4.3.1 Reuse of wood packaging material	[48]					
4.3.2 Repaired wood packaging material	[49]					
4.3.2 Repaired wood packaging material	[50]	End of third sentence	Edit	repaired, the wood used for the repair is treated and marked in accordance with this standard	Clarity	PPPO
4.3.2 Repaired wood packaging material	[51]					
4.3.3 Remanufactured wood packaging material	[52]					
4.3.3 Remanufactured wood packaging material	[53]					
4.3.3 Remanufactured wood packaging material	[54]					
4.4 Transit arrangements	[55]					
4.4 Transit arrangements	[56]					
4.5 Procedures upon import	[57]					
4.5 Procedures upon import	[58]					
4.5 Procedures upon import	[59]					
4.6 Measures for non- compliance at point of	[60]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
4.6 Measures for non- compliance at point of	[61]					
4.6 Measures for non- compliance at point of	[62]	1 st Sentence	Editorial	Where wood packagingtreatment, phytosanitary action may be taken.	Clarity	PPPO
ANNEX 1	[63]					
ANNEX 1: TITLE	[64]					
ANNEX 1: TEXT	[65]					
ANNEX 1: TEXT	[66]		Substantive	Removal of bark is to be applied in addition to one of the other treatments as specified below. However, any number of small pieces of bark may remain after removal of bark: - if they are less than 3 centimetres in width (regardless of the length) or - if greater than 3 centimetres in width, with the total surface area of an individual piece of bark less than 50 square centimetres	During 2006 and 2007 there were several drafts of a standard examining bark free and debarked wood. It was agreed at the CPM in 2008 that the recognition of bark free and debarked would be included in the revision of ISPM 15. While there is a little text added to annex 1 it does not seem to address the major concern regarding the debarked and bark free standard in that there is no PRA relating risk to bark size (that is, there appears to be the adoption of an arbitrary figure for the amount of bark that can be left). While there may be science as to the size of a piece of bark this needs included (referenced) in this revision in order to avoid similar comments as were received in relation to the bark free and debarked drafts.	
ANNEX 1: Heat treatment	[67]					
ANNEX 1: Heat treatment	[68]	1st sentence	Edit Subst	WPM must be heated Add as new para. 69 The removal of bark as stipulated above should always precede the heat treatment.	In accordance with CPM guidance – part of a recipe To be consistent with MB treatment	PPPO
ANNEX 1: Heat treatment	[69]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
ANNEX 1: Methyl bromide treatment	[70]					
ANNEX 1: Methyl bromide treatment	[71]	1st sentence	substantive	Delete the first sentence . Place the remainder of the paragraph as a footnote. Put the footnote reference against the heading (70)	Paragraph not guidance for the use of the MBr treatment	PPPO
ANNEX 1: Methyl bromide treatment	[72]					
ANNEX 1: Methyl bromide treatment	[73]	1st sentence, 3rd line	technical	Delete (including at its core)	Technically not applicable.	PPPO
ANNEX 1: Methyl bromide treatment (table 1)	[74]					
ANNEX 1: Methyl bromide treatment	[75]					
ANNEX 1: Methyl bromide treatment (table 2)	[76]					
ANNEX 1: Methyl bromide treatment	[77]	Dash point 9	Editorial comment	Replace the bullet point with the following text: "The measured temperature of the product or the ambient air (whichever is the lower) must be used to calculate the methyl bromide dose, and should be at least 10°C throughout the duration of the treatment"	The original wording could be misinterpreted to mean that the product temperature must be the same as the ambient air temperature. This was not intended by TPFQ and is not a technical requirement of this treatment.	PPPO
ANNEX 2	[78]					
ANNEX 2: TITLE	[79]					
ANNEX 2: TEXT	[80]	dash point 3	Subst	- a producer/treatment provider code	To take account of the different situations in different countries.	PPPO
ANNEX 2: Symbol	[81]					
ANNEX 2: Symbol	[82]					
ANNEX 2: Country	[83]					

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
code						
ANNEX 2: Country code	[84]	2nd sentence	substantive	Producer/treatment provider code	as above	PPPO
ANNEX 2: Producer code	[85]	Heading.	Subst	Producer/treatment provider code	As above	PPPO
ANNEX 2: Producer code	[86]	First line	Subst.	Producer/treatment provider code	As above	PPPO
ANNEX 2: Text on mark	[87]	Preceeding para. 87	Edit	Add new heading "Application of the mark"	Paragraphs 87 onwards do not refer to the producer code but to the application of the mark.	PPPO
ANNEX 2: Text on mark	[88]					
ANNEX 2: Text on mark	[89]					
ANNEX 2: Text on mark	[90]					
ANNEX 2: Text on mark	[91]					
ANNEX 2: Text on mark	[92]					
ANNEX 2: Text on mark	[93]					
ANNEX 2: Text on mark	[94]					
ANNEX 2: Text on mark	[95]	Example 1				
ANNEX 2: Text on mark	[96]	Example 2				
ANNEX 2: Text on mark	[97]	Example 3				
ANNEX 2: Text on mark	[98]	Example 4				
ANNEX 2: Text on	[99]	Example 5				

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
mark						
ANNEX 2: Text on mark	[100]	Example 6				
APPENDIX 1	[101]					
APPENDIX 1: TITLE	[102]					
APPENDIX 1: TEXT	[103]					
APPENDIX 1: TEXT	[104]	Below the last dash point	substantive	Add new bullet : return to exporting country	to allow more options	PPPO
APPENDIX 1: TEXT	[105]					
APPENDIX 2	[106]					
APPENDIX 2: TITLE	[107]					
APPENDIX 2: TEXT	[108]					

Template for comments - Draft ISPMs for country consultation, 2008- Southwest Pacific/PPPO

DRAFT 2/7: CATEGORIZATION OF COMMODITIES ACCORDING TO THEIR PHYTOSANITARY RISK

See <u>instructions</u> on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS				We think this draft standard doesn't add any significant value to the pest risk analysis system.		PPPO
				If the draft standard is to be used then it could be as a basis for an annex to one of the ISPMs on PRA.		
				We feel this draft standard implies that measures are not applied for other areas of the pathway for a commodity entering a country. It should be confirmed that the whole pathway must be considered in determining phytosanitary requirements.		
				Whilst recognising that the draft std specifically excludes contaminating pests, the statements that a processed product "should not be deemed to require phytosanitary measures" without clarifying that this only applies to the specific product (and not contaminating pests) seems to be unreasonable.		
				Draft does not deal with LMOs and Biological control agent		
SPECIFIC COMMENTS				There is no need to quote or reference other standards throughout this document – it is distracting.		PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				"capable of harbouring pests" comes from the IPPC Art I, 4 and the definition of regulated article in Art II. The phrase occurs 3 times in the standards one of those as a quote. The phrase seems pedantic and rather old-fashioned. We suggests "viable pathway" . ISPM No. 12 uses 'potential for introducing regulated pests'. This could be pest introduction potential All instances of "harbours etc" could be changed.		
TITLE	[1]	title	Subst.	'Categories of processed products relating to pest status and intended use'	Makes it specific.	PPPO
CONTENTS	[2]					
INTRODUCTION	[3]					
SCOPE	[4]					
SCOPE	[5]					
SCOPE	[6]					
SCOPE	[7]			Draft should consider contaminating pests after processing	Contaminating pests pose a Phytosanitary risks with processed products in international trade	PPPO
REFERENCES	[8]					
REFERENCES	[9]					
REFERENCES	[10]					
REFERENCES	[11]					
REFERENCES	[12]					
REFERENCES	[13]					
REFERENCES	[14]					
REFERENCES	[15]					
REFERENCES	[16]					
REFERENCES	[17]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
DEFINITIONS	[18]					
DEFINITIONS	[19]	1st sentence	Editorial	Definitions of phytosanitary terms used in this the present standard can be found in ISPM No. 5 (<i>Glossary of phytosanitary terms</i>).	"In this standard" is better than "in the present standard".	PPPO
OUTLINE OF REQUIREMENTS	[20]					
OUTLINE OF REQUIREMENTS	[21]	1st Sentence	Editorial	The concept of phytosanitary risk categorization of commodities considers the combination of combines the method and degree	NPPOs are considering how the combination of method and degree of processing affects any phytosanitary risks identified.	PPPO
OUTLINE OF REQUIREMENTS	[22]	1st Sentence	Editorial	This combination <u>may</u> allows phytosanitary risks associated	"May allow" relies on the identification of risks and determination of the level of efficacy of the measures by the NPPO through PRA.	PPPO
		2nd sentence	editorial	The objective of such <u>categorization</u> <u>categories</u> is to provide importing		
OUTLINE OF REQUIREMENTS	[23]					
BACKGROUND	[24]					
BACKGROUND	[25]	1st sentence, 2nd line	substantive	introduce regulated pests and so should not be regulated for pests related directly to the processed commodity (i.e. phytosanitary measures are not required).	See specific comments on contaminating pests.	PPPO
BACKGROUND	[26]	1st line	edit	Replace "probability" with "risk"	Consistency with figure.	PPPO
BACKGROUND	[27]		substantive	The concept of phytosanitary risk categorization of commodities considers the effect of the combination of method and degree of processing to which a commodity has been subjected with its intended use and consequent-potential as a pathway for introduction of regulated pests.	The consideration if of the combination of the method and degree of processing has on the risks associated with the commodity.	
BACKGROUND	[28]		Substantive	The objective of the categorization in this standard is to classify commodities according to their phytosanitary risk to provide	See general comment above regarding the use of PRA. An NPPO will need to determine the pests present in a commodity	PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				importing contracting parties with guidelines to better identify the need for a pathway-initiated PRA and facilitate the decision-making process.	before they can determine if the method and level of processing addresses the phytosanitary risks.	
BACKGROUND	[29]					
BACKGROUND	[30]	Whole para	Subst.	Re-write para 30 to reflect the various types of intended use	'Intended use' of a commodity is determined/stated by the importer and the NPPO undertakes PRA to determine phytosanitary risk associated with the intended use	PPPO
BACKGROUND	[31]	Whole para	Subst	Re-write this paragraph retaining quotes from ISPM 12, section 1.1.	For clarity	PPPO
BACKGROUND	[32]					
REQUIREMENTS	[33]					
REQUIREMENTS	[34]	Whole para	Substantive	The use of the phytosanitary risk categories by National Plant Protection Organizations (NPPOs) in determining any phytosanitary regulations should take into account, in particular, the principles of technical justification, pest risk analysis, risk management, minimal impact, harmonization and sovereignty.	Seems inconsistent with the rest of the standard in that PRAs (and technical justification) only apply to certain categories. Additionally, there are a number of other, basic, IPPC principles that could be included and that contracting parties should be aware of all of their obligations not just specific obligations.	PPPO
REQUIREMENTS	[35]	1 st sentence	Substantive	categorize it according to its risk level.	How do you determine a "risk level" if you haven't conducted a PRA? See previous comments on the use of PRA to determine the level of risk.	PPPO
REQUIREMENTS	[36]					
REQUIREMENTS	[37]	Whole para	Substantive	Modification of the intended use from that identified as the pathway assessed by the PRA may result in a PRA being undertaken on the modified intended use. This standard does not consider cases of deviation from intended use.	PRA undertaken on a pathway (i.e. a commodity, subject to a level and method of processing and an intended use). A new pathway would potential need to be considered if the intended use changed.	PPPO
1. Elements of Categorization	[38]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
1. Elements of Categorization	[39]	2 nd sentence	Substantive	the nature of the commodity, rendering it unable to harbour pests. Such a commodity should not be deemed to require phytosanitary measures.	"harbour" pests in relation to the commodity itself but, considering the sentence following, there may be confusion regarding the status of contaminating pests and the requirement of phytosanitary measures.	PPPO
1. Elements of Categorization	[40]					
1. Elements of Categorization	[41]	Last sentence			This status that contaminating pests might be detected during inspection but the idea is to have no inspection necessary as there is not risk with processed products Seems circular	PPPO
1.1 Method and degree of	[42]					
1.1 Method and degree of	[43]		substantive	effect on any associated regulated pest, and hence affect the potential of the commodity to be a pathway for pest introduction. harbour pests.	NPPOs should be assessing the pathway (any means that allows the entry or spread of a pest) if part of the determination is not just the commodity itself but also the level of and method of processing and the intended use. See general comment regarding pathway versus commodity	PPPO
1.1 Method and degree of	[44]					
1.1 Method and degree of	[45]					
1.1 Method and degree of	[46]	1 st dash point	Substantive	- processed to the point where the commodity potential does not remain for the pathway to introduce the commodity does not remain capable of harbouring or spreading pests	NPPOs should be assessing the pathway (any means that allows the entry or spread of a pest) if part of the determination is not just the commodity itself but also the level of and method of processing and the intended use. See general comment regarding pathway versus commodity.	PPPO
		2 nd dash point	Substantive	- processed to a point where theccommodity remains a pathway pathway remains for	NPPOs should be assessing the pathway (any means that allows the entry or spread of a pest) if part of the determination is not	

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				introducing commodity remains capable of harbouring or spreading regulated pests	just the commodity itself but also the level of and method of processing and the intended use. See general comment regarding pathway versus commodity	
1.1 Method and degree of	[47]	1 st sentence	Substantive	method and degree of processing concludes that the pathway does not have the potential to introduce a commodity does not have the capacity to harbour regulated pests	NPPOs should be assessing the pathway (any means that allows the entry or spread of a pest) if part of the determination is not just the commodity itself but also the level of and method of processing and the intended use. See general comment regarding pathway versus commodity.	PPPO
		end 1 st sentence	substantive	there is no need to consider intended use and the commodity should not be regulated <u>unless</u> the PRA has determined that regulated pests may remain as contaminating pests.	See general comments regarding contaminating pests.	
1.1 Method and degree of	[48]					
1.2 Intended use after import	[49]					
1.2 Intended use after import	[50]	Separate bullet	editori	Separate bullet point for "decorative and functional uses"	The commodity remains cf those that are consumed	PPPO
1.2 Intended use after import	[51]	1 st sentence	Substantive	The intended use may affect a commodity's potential to <u>aid in the establishment</u> introduce or spread regulated pests, and hence the phytosanitary risks associated with the commodity.	The commodities potential to introduce a pest remains the same it is the potential of the pest to establish and spread that is affected by its intended use as noted in Section 2.3 of ISPM 2.	PPPO
		2 nd sentence	substantive	a higher probability of <u>a regulated pest</u> <u>establishing introducing regulated pests</u> than others	The commodities potential to introduce a pest remains the same it is the potential of the pest to establish and spread that is affected by its intended use as noted in Section 2.3 of ISPM.	
		last sentence	Substantive	Any phytosanitary measures applied should be proportional to the risk identified in the	Language from ISPM 2 – Section 3	

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				pest risk assessment. consistent with the phytosanitary risk presented.		
2. Phytosanitary Risk Categories and	[52]					
2. Phytosanitary Risk Categories and	[53]		Substantive	its intended use and its subsequent potential to remain a pathway for the introduction of for harbouring or spreading regulated pests allows phytosanitary risk categories to be assigned.	NPPOs should be assessing the pathway (any means that allows the entry or spread of a pest) if part of the determination is not just the commodity itself but also the level of and method of processing and the intended use. See general comment regarding pathway versus commodity.	PPPO
2. Phytosanitary Risk Categories and	[54]					
2. Phytosanitary Risk Categories and	[55]	2nd sentence	substantive	Addother than compliance with the processing method and degree.	To take account of verification needs.	PPPO
2. Phytosanitary Risk Categories and	[56]					
2. Phytosanitary Risk Categories and	[57]	1 st sentence	Substantive	method may not eliminate all regulated pests of concern.	Wouldn't all regulated pests, by definition, be "of concern"?	PPPO
		2 nd Sentence	Substantive	If it is determined that the <u>combination of the</u> method and degree of processing	Need to consider both the method and level in combination.	
2. Phytosanitary Risk Categories and	[58]	2 nd sentence	Substantive	Such information should assist importing contracting parties in <u>determining which</u> category the commodity should be assigned <u>to.</u> judging the category of individual commodity appropriately.	NPPOs should determine not judge	PPPO
2. Phytosanitary Risk Categories and	[59]	1 st Sentence	Substantive	In cases where the evaluation of the effect of the combination of the method and degree of processing has	Need to consider both the method and level in combination.	PPPO
2. Phytosanitary Risk Categories and	[60]					
2. Phytosanitary Risk Categories and	[61]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
2. Phytosanitary Risk Categories and	[62]	1 st sentence	Substantive	the potential to be a pathway for the introduction harbour or spread regulated pests, determining phytosanitary measures should may be required based on the result of PRA.	NPPOs should be assessing the pathway (any means that allows the entry or spread of a pest) if part of the determination is not just the commodity itself but also the level of and method of processing and the intended use. See general comment regarding pathway versus commodity. Determining risk management should not "may: be based on PRA.	PPPO
2. Phytosanitary Risk Categories and	[63]					
2. Phytosanitary Risk Categories and	[64]					
2. Phytosanitary Risk Categories and	[65]	1 st sentence	Substantive	or planting, their potential to <u>aid in the</u> <u>establishment</u> introduce or spread regulated pests is higher than that for other	The commodities potential to introduce a pest remains the same it is the potential of the pest to establish and spread that is affected by its intended use as noted in Section 2.3 of ISPM 2.	PPPO
2. Phytosanitary Risk Categories and	[66]		Substantive/editorial	Delete whole paragrahp	Refer to para 74 and 75	PPPO
ANNEX 1	[67]					
ANNEX 1: TITLE	[68]					
ANNEX 1: TABLE	[69]		technical	row 6 A series of actions ofthe germination of cereal seeds in order to develop its enzymatic activity to digest starchy materials into sugars and cessation of enzymatic activity by heating	Row 5 freezing may not kill fungi, bacteria even at this temperature.	PPPO
ANNEX 2	[70]					
ANNEX 2: TITLE	[71]	chapeau	observation		Some explanation should be provided to indicate that some of these processes will kill pests.	PPPO
ANNEX 2: TABLE	[72]	Row 7	Observation		Painting etc would stop penetration of fumigants	PPPO

1. Section	1	3. sentence/row/indent, etc.	V A	5. Proposed rewording	6. Explanation	7. Country
APPENDIX 1	[73]					
APPENDIX 1: TITLE	[74]					
APPENDIX 1: FLOW CHART	[75]				Suggest deleting flow-chart.	PPPO

Template for comments - Draft ISPMs for country consultation, 2008- Southwest Pacific/PPPO

DRAFT 3/7: FRUIT FLY TRAPPING (ANNEX 1 TO ISPM NO. 26 (ESTABLISHMENT OF PEST FREE AREAS FOR FRUIT FLIES (TEPHRITIDAE))

See <u>instructions</u> on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS				Consider if the use of exclusion is appropriate for this standard. In the FF stds – 'maintenance of pest freedom' or 'specified level' is commonly used. Exclusion really refer to action taken outside of the area preventing entry. Regarding the terms Commercial / Primary / Wild/ Secondary / Occasional agreement is needed on the meanings of this terms Either change Annex to Appendix or have as an Annex with the trap information (3.3) removed to an Appendix		PPPO
SPECIFIC COMMENTS			technical	Generally Bactrocera spp occurs in the Asia Pacific region but only one references from the region are included in the selected list. According to Drew and Hopper, 1981, B.cucumis is a fruit fly species currently known to occur only in Australia and it is not attracted to CUE.		
TITLE	[1]		subst	Guidelines for Fruit fly trapping	Clarity	PPPO

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
CONTENTS	[2]					
FRUIT FLY TRAPPING	[3]					
FRUIT FLY TRAPPING	[4]	3rd sentence Last line	Edit	"information in this annex can be used by NPPOs to aid them in developing PFAs or ALPPs in accordance with guidance provided in ISPM No.s 26 and 30." Delete "equivalent" and insert "equally valid"	Clarity	PPPO
1. Trapping Survey Objectives and	[5]					
1. Trapping Survey Objectives and	[6]					
1. Trapping Survey Objectives and	[7]	4th dashpoint	Subst	Delete "exclusión" insert "Maintenance of pest absence or specified level" last sentence if it is feasible, eradication may be required.	Exclusión not used in ISPMs re FFs	PPPO
2. Trapping Scenarios	[8]					
2. Trapping Scenarios	[9]	2nd dash point	Subst	delimiting and monitoring survey	accuracy	PPPO
2. Trapping Scenarios	[10]					
2. Trapping Scenarios: Table 1	[11]	Footnote to table	Edit	Add to footnote – (refer to section 3.4.6)	Clarity	PPPO
2. Trapping Scenarios	[12]					
3. Trapping Systems for Fruit Fly Surveys	[13]					
3. Trapping Systems for Fruit Fly Surveys	[14]	1st and 2nd dashpoint	Edit	Remove bracketed text	Unnecessary	PPPO
3. Trapping Systems for Fruit Fly Surveys	[15]					
3. Trapping Systems for Fruit Fly Surveys:	[16]	Alongside <i>B</i> cucumisin table	technical	CUE, PB	Refer to Drew and Hooper, 1981 – reference included in the selected	PPPO

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
Table 2		Alongside <i>B</i> cucumisin table	Edit		references list. Typo?? Or Protein Bait? PB not noted in document	
3.1 Attractants and lures	[17]					
3.1.1 Male specific	[18]	Section	Technical /Substantive		Specifications on longevity of pheromone lures are very dependent upon manufacturer and inherent local environmental factors, and changes in formulation are driven by manufacturers and this is an unregulated industry. Some sources of lures may actually be ineffective in some inherent conditions, thus if these info are to be retained in the final ISPM there should be some caution included. Quality control of lures is an important issue. Need a section on this.	PPPO
3.1.1 Male specific	[19]					
3.1.2 Female biased	[20]					
3.1.2 Female biased	[21]					
3.1.2 Female biased	[22]					
3.1.2 Female biased: Table 3a	[23]	Along side B.cucumis	technical Edit	Add Bactrocera papayae	Ask for clarification on B.cucumis being attracted to trap types that are listed under CUE column Missing from this table	PPPO
3.1.2 Female biased: Table 3b	[24]		Edit	Add Bactrocera papayae	Missing from this table	PPPO
3.1.2 Female biased: Table 4	[25]					

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.1.2 Female biased	[26]					
3.2 Killing agents	[27]	[27]	Section	Technical / Substantive	This section is probably under emphasised compared to Section 3.1 and Table 3b and 4. Failure of the "killing agent" component can cause failure of a survey despite getting all other factors right. A summary of how the preferred active ingredients dichlorvos, malathion, spinosad and pyrethroids are to be deployed in each trap type effectively would be helpful, eg. concentration and replacement intervals.	PPPO
3.2 Killing agents	[28]	2nd sentence	Subst	Include Fipronil in the list	Fipronil at very low concentration is effective in controlling CUE flies	PPPO
3.2 Killing agents	[29]					
3.3 Trapping devices	[30]					
3.3 Trapping devices	[31]					
3.3 Trapping devices	[32]					
3.3 Trapping devices: Cook and Cunningham Trap	[33]					
3.3 Cook and Cunningham Trap (general description)	[34]					
3.3 Cook and Cunningham Trap (general description)	[35]					
3.3 Cook and Cunningham Trap (use)	[36]					
3.3 Cook and Cunningham Trap (use)	[37]					
3.3 Cook and	[38]		Edit	Change to: see Table 2	to be consistent with other references	PPPO

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
Cunningham Trap (use)						
3.3 Cook and Cunningham Trap (use)	[39]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Cook and Cunningham Trap (use)	[40]		Editorial	For use under different scenarios and recommended densities, (see Table 5 <u>d</u>).		PPPO
3.3 Trapping devices: ChamP Trap	[41]					
3.3 ChamP Trap (general description)	[42]					
3.3 ChamP Trap (general description)	[43]					
3.3 ChamP Trap (use)	[44]					
3.3 ChamP Trap (use)	[45]		Edit	Change to "Yellowpantel trap/Rebell trap"	Consistency with page 15.	PPPO
3.3 ChamP Trap (use)	[46]		Edit	Change to: see Table 2		
3.3 ChamP Trap (use)	[47]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 ChamP Trap (use)	[48]		Editorial	For use under different scenarios and recommended densities, (see Tables 5 a, b, c, d, e and f).		PPPO
3.3 Trapping devices: Easy Trap	[49]					
3.3 Easy Trap (general description)	[50]				_	
3.3 Easy Trap (general description)	[51]					
3.3 Easy Trap (use)	[52]					
3.3 Easy Trap (use)	[53]					
3.3 Easy Trap (use)	[54]					

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.3 Easy Trap (use)	[55]		Edit	Change to: see Table 2		PPPO
3.3 Easy Trap (use)	[56]					
3.3 Easy Trap (use)	[57]					
3.3 Trapping devices: Jackson Trap or Delta Trap	[58]					
3.3 Jackson Trap or Delta Trap (general description)	[59]					
3.3 Jackson Trap or Delta Trap (general description)	[60]					
3.3 Jackson Trap or Delta Trap (use)	[61]					
3.3 Jackson Trap or Delta Trap (use)	[62]					
3.3 Jackson Trap or Delta Trap (use)	[63]		Edit	for many years this trap has been used in maintenance of pest absence and supression and eradication programmes	Need for consistency	PPPO
3.3 Jackson Trap or Delta Trap (use)	[64]					
3.3 Jackson Trap or Delta Trap (use)	[65]		Edit	Change to: see Table 2		PPPO
3.3 Jackson Trap or Delta Trap (use)	[66]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Jackson Trap or Delta Trap (use)	[67]		Editorial	For use under different scenarios and recommended densities, (see Tables 5 <u>b</u> and d).		PPPO
3.3 Trapping devices: Lynfield Trap	[68]					
3.3 Lynfield Trap (general description)	[69]					

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.3 Lynfield Trap (general description)	[70]					
3.3 Lynfield Trap (use)	[71]					
3.3 Lynfield Trap (use)	[72]					
3.3 Lynfield Trap (use)	[73]					
3.3 Lynfield Trap (use)	[74]		Edit	Change to: see Table 2		PPPO
3.3 Lynfield Trap (use)	[75]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Lynfield Trap (use)	[76]		Editorial	For use under different scenarios and recommended densities, (see Tables 5 <u>b</u> and d).		PPPO
3.3 Trapping devices: McPhail Trap Type	[77]		Edit	Delete "type"	consistency	PPPO
3.3 McPhail Trap Type (general description)	[78]					
3.3 McPhail Trap Type (general description)	[79]					
3.3 McPhail Trap Type (use)	[80]					
3.3 McPhail Trap Type (use)	[81]					
3.3 McPhail Trap Type (use)	[82]					
3.3 McPhail Trap Type (use)	[83]					
3.3 McPhail Trap Type (use)	[84]					

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.3 McPhail Trap Type (use)	[85]	1st sentence 2nd sentence	editorial	Delete "type" Delete "track" and replace with monitor.	Consistency Consistency	PPPO
3.3 McPhail Trap Type (use)	[86]	Last word	Edit	Change to Annex	Accuracy	PPPO
3.3 McPhail Trap Type (use)	[87]		Edit	Change to: see Table 2		
3.3 McPhail Trap Type (use)	[88]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 McPhail Trap Type (use)	[89]		Editorial	For use under different scenarios and recommended densities, (see Tables 5 a, b, c, d, e and f).		PPPO
3.3 Trapping devices: Multilure Trap	[90]					
3.3 Multilure Trap (general description)	[91]					
3.3 Multilure Trap (general description)	[92]					
3.3 Multilure Trap (use)	[93]					
3.3 Multilure Trap (use)	[94]					
3.3 Multilure Trap (use)	[95]					
3.3 Multilure Trap (use)	[96]					
3.3 Multilure Trap (use)	[97]		Edit	Change to: see Table 2		PPPO
3.3 Multilure Trap (use)	[98]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Multilure Trap (use)	[99]		Editorial	For use under different scenarios and recommended densities, (see Tables 5		PPPO

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				<u>a, b, c, d, e and f)</u> .		
3.3 Trapping devices: Open Bottom Dry or (Phase IV) Trap	[100]					
3.3 Open Bottom Dry or (Phase IV) Trap (general description)	[101]					
3.3 Open Bottom Dry or (Phase IV) Trap (general description)	[102]					
3.3 Open Bottom Dry or (Phase IV) Trap (use)	[103]					
3.3 Open Bottom Dry or (Phase IV) Trap (use)	[104]	Last sentence	editorial	Delete "type"	consistency	PPPO
3.3 Open Bottom Dry or (Phase IV) Trap (use)	[105]		Edit	Change to: see Table 2		
3.3 Open Bottom Dry or (Phase IV) Trap (use)	[106]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Open Bottom Dry or (Phase IV) Trap (use)	[107]		Editorial	For use under different scenarios and recommended densities, (see Table 5 <u>d</u>).		PPPO
3.3 Trapping devices: Red Sphere Trap	[108]					
3.3 Red Sphere Trap (general description)	[109]					
3.3 Red Sphere Trap (general description)	[110]					
3.3 Red Sphere Trap (use)	[111]					

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.3 Red Sphere Trap (use)	[112]					
3.3 Red Sphere Trap (use)	[113]					
3.3 Red Sphere Trap (use)	[114]		Edit	Change to: see Table 2		PPPO
3.3 Red Sphere Trap (use)	[115]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Red Sphere Trap (use)	[116]		Editorial	For use under different scenarios and recommended densities, (see Table 5e).		PPPO
3.3 Trapping devices: Sensus Trap	[117]					
3.3 Sensus Trap (general description)	[118]					
3.3 Sensus Trap (general description)	[119]	2 nd sentence	Editorial	which has a <u>series of holes</u> just underneath it.	the picture seems to show a row of holes	PPPO
3.3 Sensus Trap (use)	[120]					
3.3 Sensus Trap (use)	[121]					
3.3 Sensus Trap (use)	[122]		Edit	Change to: see Table 2		PPPO
3.3 Sensus Trap (use)	[123]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Sensus Trap (use)	[124]		Editorial	For use under different scenarios and recommended densities, (see Table 5 <u>d</u>).		PPPO
3.3 Trapping devices: Steiner Trap	[125]					
3.3 Steiner Trap (general description)	[126]					
3.3 Steiner Trap (general description)	[127]					
3.3 Steiner Trap (use)	[128]					
3.3 Steiner Trap (use)	[129]					
3.3 Steiner Trap (use)	[130]		Edit	Change to: see Table 2		PPPO

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.3 Steiner Trap (use)	[131]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Steiner Trap (use)	[132]		Editorial	For use under different scenarios and recommended densities, (see Table 5 b and d).		PPPO
3.3 Trapping devices: Tephri Trap	[133]					
3.3 Tephri Trap (general description)	[134]					
3.3 Tephri Trap (general description)	[135]					
3.3 Tephri Trap (use)	[136]					
3.3 Tephri Trap (use)	[137]	2 nd last sentence	substantive	will retain its killing effect for at least six months under field conditions. However, the trap should be serviced in accordance manufacturers recommendations. The net must	Need to note that they should be serviced a little more regularly than 6 monthly.	PPPO
3.3 Tephri Trap (use)	[138]		Edit	Change to: see Table 2		PPPO
3.3 Tephri Trap (use)	[139]		Editorial	For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Tephri Trap (use)	[140]		Editorial	For use under different scenarios and recommended densities, (see Tables 5 b, c, d and e).		PPPO
3.3 Trapping devices: Yellow Panel/Rebell Trap	[141]	entire description	Editorial		Move to directly after description of "Cham P Trap" as the description notes similarities.	PPPO
3.3 Yellow Panel/Rebell Trap (general description)	[142]					
3.3 Yellow Panel/Rebell Trap (general description)	[143]					
3.3 Yellow	[144]					

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
Panel/Rebell Trap (use)						
3.3 Yellow Panel/Rebell Trap (use)	[145]		Editorial	open design allow them to catch other non-target insects including natural enemies <u>of fruit flies</u> and pollinators.		PPPO
3.3 Yellow Panel/Rebell Trap (use)	[146]		Edit Edit	Ceratitis spp and Rhagoletis spp in YP or Rebell while Bactrocera oleae in YP only.	Clarification	PPPO
3.3 Yellow Panel/Rebell Trap (use)	[147]		Editorial	Change to: see Table 2 For attractants used and rebaiting, (see Tables 3 and 4).		PPPO
3.3 Yellow Panel/Rebell Trap (use)	[148]		Editorial	For use under different scenarios and recommended densities, (see Tables 5 b, c, d and e).		PPPO
3.4 Trapping procedures	[149]					
3.4.1 Layout of trapping network	[150]					
3.4.1 Layout of trapping network	[151]					
3.4.1 Layout of trapping network	[152]					
3.4.1 Layout of trapping network	[153]		Substantive	In areas with scattered commercial orchards, rural areas with fruit hosts and in marginal areas where commercial and wild hosts exist, trap network arrays are normally distributed along roads that provide access to host material.	see specific comments regarding hosts	PPPO
3.4.1 Layout of trapping network	[154]	1st line	edit	Replace "exclusion" with "maintenace" of pests absence	clarity	PPPO
3.4.2 Trap	[155]					

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
deployment (placement)						
3.4.2 Trap deployment (placement)	[156]	2nd sentence			Consider use of primary, secondary and ocasional fruit fly hostscf 153 and comercial and wild hosts and 158 and 161	PPPO
3.4.2 Trap deployment (placement)	[157]				Is there a referente for trap site selection. This is very short for such an important subject.	PPPO
3.4.2 Trap deployment (placement)	[158]	2 nd sentence	substantive	deployed in primary host plants during	see specific comments regarding hosts	PPPO
3.4.2 Trap deployment (placement)	[159]					
3.4.2 Trap deployment (placement)	[160]					
3.4.2 Trap deployment (placement)	[161]	1 st sentence	Substantive	Traps have to be relocated following the maturation phenology of the primary fruit hosts and the biology of the fruit fly species.	see specific comments regarding hosts	PPPO
3.4.3 Trap mapping	[162]					
3.4.3 Trap mapping	[163]	2 nd sentence	Editorial	with <u>the</u> use of the -global positioning system (GPS)		PPPO
3.4.3 Trap mapping	[164]		editorial	The application of the GPS and geographic information systems (GIS) in the management of trapping network has proved to be a very powerful tool. The GPS allows each trap to be georeferenced through geographical coordinates, which are then used as input information in a the GIS.		PPPO
3.4.3 Trap mapping	[165]	2 nd sentence	Substantive	The trap reference should be clear enough to allow those servicing the	very specific language that may not be applicable in all contracting parties.	PPPO

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				traps trappers, control brigades and supervisors to find the trap easily.		
3.4.3 Trap mapping	[166]		Editorial	A database or trapping book of all traps with their corresponding coordinates is kept, together with the records of trap services, rebaiting, trap catches etc. GIS provides high-resolution maps showing the exact location of each trap and other valuable information such as exact location of fruit fly finds (incursions or outbreaks), historical profiles of the geographical distribution patterns of the fruit flies pest, and relative size of the populations in given areas. This information is extremely useful in planning control and/or suppression activities, ensuring that bait sprays and sterile fly releases are accurately placed and cost-effective in their application		PPPO
3.4.4 Trap servicing and inspection	[167]					
3.4.4 Trap servicing and inspection	[168]	Add new sentence to para.	Subst	It is recommended that an anti-ant material be applied to the trap to prevent the possible invasion by ants.	To prevent ant invasion of traps	PPPO
3.4.4 Trap servicing and inspection	[169]					
3.4.4 Trap servicing and inspection	[170]					
3.4.4 Trap servicing and inspection	[171]					
3.4.4 Trap servicing and inspection	[172]		Substantive	The number of traps serviced per day per person will vary depending on type of survey, environmental and topographic conditions and trapper	very specific language that may not be applicable in all contracting parties	PPPO

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				experience of the operator.		
3.4.5 Trapping records	[173]					
3.4.5 Trapping records	[174]		Substantive	target <u>fruit</u> fly capture. Any other information considered necessary can be added to the trapping records. The trapping records should be retained for at least 24 months and made available to the NPPO of the importing country on request.	This information should be in the PFA/ALPP standards not in a trapping standard. Inclusion of the requirement to keep records should be sufficient.	PPPO
3.4.6 Flies per trap per day	[175]					
3.4.6 Flies per trap per day	[176]					
3.4.6 Flies per trap per day	[177]					
3.4.6 Flies per trap per day	[178]					
3.4.6 Flies per trap per day	[179]					
3.4.6 Flies per trap per day	[180]		editorial	In areas where sterile <u>fruit</u> flies are being released it is used to measure the relative abundance of the sterile and wild <u>fruit</u> flies.		PPPO
3.4.6 Flies per trap per day	[181]					
4. Trap Densities	[182]					
4. Trap Densities	[183]					
4. Trap Densities	[184]					
4. Trap Densities: Figure 19	[185]					
4. Trap Densities	[186]		Editorial	than the recommended densities shown in Table 5 <u>a - f</u> .		PPPO

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
4. Trap Densities	[187]					
4. Trap Densities: Table 5a	[188]					
4. Trap Densities: Table 5b	[189]					
4. Trap Densities: Table 5c	[190]					
4. Trap Densities: Table 5d	[191]					
4. Trap Densities: Table 5e	[192]					
4. Trap Densities: Table 5f	[193]					
5. Delimiting Surveys	[194]					
5. Delimiting Surveys	[195]	1st sentence	substantive	Delete "and to determine if it is an outbreak"	Delimiting surveys do not do this	PPPO
5. Delimiting Surveys	[196]		Substantive	A delimiting survey should must be implemented as soon as possible after the initial detection of a targeted fruit fly. The duration of a delimiting survey should be dependent on the developmental biology of the species. In general, delimiting survey trapping occurs for three life cycles past the last find for multivoltine species. However, one or two generations may be used for particular situations or fruit fly species based on scientific information, as well as that provided by the surveillance system in place.	should, shall, may and must	PPPO
5. Delimiting Surveys: Figure 20	[197]	Table in Fig 20	Edit	Anastrepha spp.		PPPO
5. Delimiting Surveys:	[198]					

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
Figure 21						
6. Supervision Activities	[199]					
6. Supervision Activities	[200]					
6. Supervision Activities	[202]		Editorial	Formal independent evaluations should occur periodically to assess the effectiveness of the trapping survey. In order to allow for an independent evaluation, formal evaluations of the trapping programme should be conducted by a party independent of the someone who is not a part of the trapping programme. The timing of evaluations will vary by programme, but it is recommended to occur at least twice a year in programmes that run for six months or more. The evaluation should addresses all aspects related to the ability of the trapping programme to detect targeted fruit flies pests in a timely manner.		PPPO
6. Supervision Activities	[203]					
6. Supervision Activities	[204]		Editorial	Trap placement should be evaluated for proper host selection, trap relocation schedule, height, light/shade balance, fruit fly		PPPO
6. Supervision Activities	[205]					
6. Supervision Activities	[206]					
6. Supervision Activities	[207]	Through out the para 207	editorial	Change all the "fly"s to fruit fly's	Correct term	PPPO
6. Supervision	[208]					

1. Section	2. Para nber	3. Sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
Activities						
6. Supervision Activities	[209]		Editorial	In cases where the trapping programme is a component of an export programme, records of independent evaluations should be retained for at least 24 months because importing NPPOs trading partners may request this information or some evidence of an active independent evaluation programme. Alternatively, importing NPPOs trading partners may request that they conduct their own independent evaluation of the programme.		PPPO
7. Selected References	[210]					
7. Selected References	[211]					
7. Selected References	[212]		edit	Change ampersand to "and"		PPPO
7. Selected References	[213]					
7. Selected References	[214]					
7. Selected References	[215]			Check for page numbers		PPPO
7. Selected References	[216]					
7. Selected References	[217]			Change ampersand to "and"		PPPO
7. Selected References	[218]			Change ampersand to "and"		PPPO
7. Selected References	[219]			Change ampersand to "and"		PPPO
7. Selected References	[220]					
7. Selected References	[221]			ETC ETC		PPPO
7. Selected References	[222]					
7. Selected References	[223]					
7. Selected References	[224]					
7. Selected References	[225]					
7. Selected References	[226]					

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
7. Selected References	[227]					
7. Selected References	[228]					
7. Selected References	[229]					
7. Selected References	[230]					
7. Selected References	[231]					
7. Selected References	[232]					
7. Selected References	[233]					
7. Selected References	[235]					
7. Selected References	[236]					
7. Selected References	[237]					
7. Additional Reference	238	New para	New reference	Drew and Hooper 1981, Journal of Australian Entomological Society pg 203.		PPPO

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DRAFT 4/7: AMENDMENTS TO ISPM NO. 5 (GLOSSARY OF PHYTOSANITARY TERMS)

See <u>instructions</u> on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Para nber	3. sentence/ row/indent etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS						
SPECIFIC COMMENTS						
TITLE	[1]					
Proposed definition: incidence (of a pest)	[2]		Question	The acceptance number is the number of infested units or the number of individual pests that are permissible in a sample of a given size before phytosanitary action is taken.	Is "incidence" similar to "acceptance number" (ISPM 31 (Methodologies for sampling of consignments) Section 3.1.1.1)	PPPO
Proposed definition: tolerance level (of a pest)	[3]		substantive	Tolerance level refers to the percentage of infestation in the entire consignment or lot that is the threshold for phytosanitary action.	ISPM 31 (Methodologies for sampling of consignments) "definition" Section 3.1.1.6	PPPO
Proposed definition: phytosanitary security (of a consignment)	[4]					
Proposed definition: corrective action plan (in an area)	[5]					
Proposed definition: compliance procedure (for a consignment)	[6]					
Proposed definition: intended use	[7]					
Proposed definition: reference specimen	[8]					

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DRAFT 5/7: SUPPLEMENT TO ISPM NO. 5: TERMINOLOGY OF THE CONVENTION ON BIOLOGICAL DIVERSITY IN RELATION TO THE GLOSSARY OF PHYTOSANITARY TERMS

See <u>instructions</u> on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS					We suggest that this document be submitted as an explanatory paper rather than a supplement to ISPM 5.	PPPO
					Thus no further comments are provided.	
SPECIFIC COMMENTS						
TITLE	[1]					
1. Introduction	[2]					
1. Introduction	[3]					
1. Introduction	[4]					
2. Presentation	[5]					
2. Presentation	[6]					
3. Terminology	[7]					
3.1 Alien species	[8]					
3.1 Alien species	[9]					
3.1 Alien species	[10]					
3.1 Alien species: Notes	[11]					
3.1 Alien species: Note 1	[12]					
3.1 Alien species: Note 2	[13]					
3.1 Alien species: Note 3	[14]					
3.1 Alien species: Note 4	[15]					
3.2 Introduction	[16]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.2 Introduction	[17]					
3.2 Introduction	[18]					
3.2 Introduction: Notes	[19]					
3.2 Introduction: Note 5	[20]					
3.2 Introduction: Note 6	[21]					
3.2 Introduction: Note 7	[22]					
3.3 Invasive alien species	[23]					
3.3 Invasive alien species	[24]					
3.3 Invasive alien species	[25]					
3.3 Invasive alien species: Notes	[26]					
3.3 Invasive alien species: Note 8	[27]					
3.3 Invasive alien species: Note 9	[28]					
3.3 Invasive alien species: Note 10	[29]					
3.3 Invasive alien species: Note 11	[30]					
3.3 Invasive alien species: Note 12	[31]					
3.4 Establishment	[32]					
3.4 Establishment	[33]					
3.4 Establishment	[34]					
3.4 Establishment: Notes	[35]					
3.4 Establishment: Note 13	[36]					
3.4 Establishment: Note 14	[37]					
3.4 Establishment: Note 15	[38]					
3.5 Intentional introduction	[39]					
3.5 Intentional	[40]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
introduction						
3.5 Intentional introduction	[41]					
3.6 Unintentional introduction	[42]					
3.6 Unintentional introduction	[43]					
3.6 Unintentional introduction	[44]					
3.6 Unintentional introduction: Notes	[45]					
3.6 Unintentional introduction: Note 16	[46]					
3.7 Risk analysis	[47]					
3.7 Risk analysis	[48]					
3.7 Risk analysis	[49]					
3.7 Risk analysis: Notes	[50]					
3.7 Risk analysis: Note 17	[51]					
3.7 Risk analysis: Note 18	[52]					
3.7 Risk analysis: Note 19	[53]					
3.7 Risk analysis: Note 20	[54]					
4. Other Concepts	[55]					
4. Other Concepts	[56]					
5. Reference	[57]					
5. Reference	[58]					

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DRAFT 6/7: STRUCTURE AND OPERATION OF POST-ENTRY QUARANTINE FACILITIES

See <u>instructions</u> on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS			substantive	'Quarantine stations' was used replace 'facilities' 'quarantine' was used to replace 'containment' This standard should be directly linked to the ISPMs on PRA. The provisions of the PEQ stations should be linked to the biological characteristics of the potential quarantine pests of the imported plant. An initial re-draft of the draft standard prepared by NZ was briefly presented and there was general support for it from the SWP Members attending the regional workshop on draft standards.		PPPO
SPECIFIC COMMENTS			Substantive	ISPM 5 includes a number of definitions that relate to plants (including plants, plants for planting, plant products, planting and plants <i>in-vitro</i>). The use of "plants" may imply that the material is imported for research/processing. The draft seems to be focused on "plants for planting" and as such this defined term should be used throughout the draft standard.		PPPO
TITLE	[1]	Change of title	Subst.	Structure and operation of post-entry-quarantine stations.	Peq stations is defined in ISPM 5	PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
CONTENTS	[2]					
INTRODUCTION	[3]					
SCOPE	[4]					
SCOPE	[5]	1st sentence, 1st line, 2nd line	Substantive	Delete 'design' and replace with 'structure' Delete 'facilities' and replace with 'station' Delete 'containment' and replace with 'quarantine'	Use defined definitions in the glossary	PPPO
		2nd sent	Subs.	Four levels of PEQ are described.		
REFERENCES	[6]					
REFERENCES	[7]	Add reference	Substantive	include ISPM 2 and ISPM 20	both of these ISPMs should provide valuable material for this standard.	PPPO
REFERENCES	[8]					
REFERENCES	[9]					
DEFINITIONS	[10]					
DEFINITIONS	[11]		Editorial	of phytosanitary terms used in this the present standard		PPPO
OUTLINE OF REQUIREMENTS	[12]					
OUTLINE OF REQUIREMENTS	[13]	1 st sentence 2 nd sentence	Substantive	quarantine (PEQ) stations that provide the appropriate level of quarantine containment for the risk that has of PEQ for a specified consignment of	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
				plants.	ISPM 5 includes a number of definitions that relate to plants (including plants, plants for planting, plant products, planting and plants <i>in-vitro</i>). The use of	

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
					"plants" may imply that the material is imported for research/processing. The draft seems to be focused on "plants for planting" and as such this defined term should be used throughout the draft standard.	
OUTLINE OF REQUIREMENTS	[14]		Subst	For each PEQ quarantine level, a procedural manual approved by the NPPO should show	Clarity	PPPO
OUTLINE OF REQUIREMENTS	[15]	1 st sentence	Substantive	unlikely to <u>transfer to a suitable host escape</u> and where the consequences of <u>escape</u> <u>transfer</u> , as <u>determined by the contracting parties NPPO</u> , are low to moderate.	Just to highlight that the NPPO will determine the consequences.	PPPO
BACKGROUND	[16]					
BACKGROUND	[17]	1 st sentence 4 th sentence	Substantive Substantive	Imported consignments of plants for planting can present a risk importing NPPOs identify risk management measures that manage the risk to an acceptable level without the need for the	ISPM 5 includes a number of definitions that relate to plants (including plants, plants for planting, plant products, planting and plants <i>in-vitro</i>). The use of "plants" may imply that the material is imported for research/processing. The draft seems to be focused on "plants for planting" and as such this defined term should be used throughout the draft standard.	PPPO
		5 th Sentence	Substantive	application of PEQ mitigate pest risk without requirements after entry For some commodities, NPPOs may decide that certain consignments should be held after entry into the country within a facility providing a known level of quarantine containment in order to reduce the risk to an acceptable level.	"requirements after entry" is confusing as it implies post quarantine. In most countries a consignment has not "entered" a country until it has been released by the NPPO (if required).	
					Containment is a defined term Application of phytosanitary	

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
					measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment. The use of "quarantine" here also means that the sentence makes sense (as it was it was implied that by simply holding something in PEQ that would address the concerns whereas "quarantine" can include testing and treatment).	
BACKGROUND	[18]		substantive	Quarantine Containment facilities may also be required to conduct research	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
BACKGROUND	[19]	1st sentence	Edit	PEQ may be required		PPPO
BACKGROUND	[20]	2nd line	Edit	escape from the facility		PPPO
GENERAL REQUIREMENTS	[21]					
1. PEQ Containment	[22]	Title	Substantive	ISPM No. 20 (Guidelines for a phytosanitary import regulatory systems), Section 4.2.2	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
		New para	Substantive	notes that NPPOs may specifically authorise a requirement for PEQ.		
1. PEQ Containment	[23]	1 st sentence 2 nd sentence	substantive	Determining the quarantine containment levels of PEQ facilities should be are based on the principles of pest risk analysis as described in ISPMs No. 2 (Framework for pest risk analysis) and No. 11 (Pest risk analysis for quarantine pests including analysis of environmental risks and living modified organisms). The pest risk assessment analysis determines the level of risk associated with the plants for planting and identifies measures, that may include PEQ, to manage the risks to an acceptable level. containment that is required.	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment. PEQ conditions should be determined through PRA	PPPO
1. PEQ Containment	[24]	1 st sentence 2 nd sentence	Substantive	The NPPO should determine the containment level of quarantine required for a specific consignment of plants for planting entering PEQ facilities based on a pest risk analysis assessment for the potential pests that may be associated with imported plants for planting material or for the imported organism itself. The assignment of the appropriate containment conditions, and if appropriate the relevant PEQ levels, should also take into account relevant circumstances in the country and the biology of the pest.	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment. Text added to the second sentence of para 23 will address this point.	PPPO
1. PEQ Containment	[25]	1 st sentence	Substantive	Annex 1 provides guidance to NPPOs in contains information on methods for determining	ISPMs should provide guidance to NPPOs.	PPPO
				The quarantine containment levels differ in		

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
		2 rd sentence 3 rd sentence	Substantive	adjusted according to the specific pest risks identified by pest risk analysis; management circumstances	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment. Need to link back to PRA determining measures.	
1. PEQ Containment	[26]	End of each bullet point	editorial	Insert 'or'		PPPO
2. PEQ Facilities	[27]					
2. PEQ Facilities	[28]					
2. PEQ Facilities	[29]					
2.1 Location	[30]					
2.1 Location	[31]					
2.2 Physical requirements	[32]					
2.2 Physical requirements	[33]	New last sentence	Substantive	facilities as appropriate. NPPOs may design facilities to a level to contain a number of pests of similar biology (for example, insects, fungal pathogens, etc).	Recognition that NPPOs are likely to develop a single facility designed for a range of pests.	PPPO
2.2 Physical requirements	[34]	Dash 1 point 2	Susbst.	 access to water supply, accessible by road delimitation of the stations should include external fencing include moat 	Necessary addition	PPPO
2.3 Operational requirements	[35]					
2.3 Operational requirements	[36]		Editorial	PEQ facilities should either be operated by, or be authorized by, the	insert 2 comma(,)	PPPO

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				NPPO.		
2.3 Operational requirements	[37]	1 st sentence	Substantive	Operational requirements to meet a specified level of quarantine containment involve	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
2.3 Operational requirements	[38]	2nd sentence	Subst.	A procedural manual approved by the NPPO should show	Clarity	PPPO
2.3 Operational requirements	[39]	Add dash points	Subst.	 add after dashpoint second-to-last "and provision of disinfestation of facility before introduction of material for screening or in the event of pest occurrence" add new dashpoint "provision for disposal of infested plant material" add new dashpoint "provision for monitoring for pest occurrence in facility using traps etc." Replace dashpoint 12 "PEQ should have a security system appropriate to the quarantine level including the control of visitors" PEQ stations should have appropriate signage 	Necessary additions.	PPPO
2.4 Release from	[40]	1st dash point	Edit	Remove (OIC)	Unnecessary	PPPO
containment						
2.4 Release from containment	[41]	Whole para	Substantive	Consignments should be released from quarantine facilities on completion of quarantinethe required inspection, testing, treatment and verification. NPPOs may	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest.	PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				implement systems to monitor or trace consignments once they have left the PEQ containment-facility.	The correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	
3. Specific Requirements for PEQ Facilities by Containment Level	[42]					
3. Specific Requirements for PEQ Facilities by Containment Level	[43]					
3. Specific Requirements for PEQ Facilities by Containment Level	[44]					
3. Specific Requirements for PEQ Facilities by Containment Level	[45]		Substantive	Appendix 1 provides a summary of the major requirements for PEQ facilities at all quarantine containment levels.	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
3.1 PEQ containment level 1	[46]		Technical		The draft ISPM on potato's provides significant details on how facilities should be set up. This information should be incorporated in the relevant places in this draft.	PPPO
3.1.1 Type of facility and use, PEQ1	[47]					
3.1.1 Type of facility and use, PEQ1	[48]	1 st sentence	Substantive	For PEQ1, the lowest <u>quarantine</u> containment level, the PEQ facility	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of	PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
		2 nd sentence	substantive	infested with quarantine pests that have a very low probability of transfer (Section 2.2.1.5, ISPM No. 11) are highly unlikely to disperse and where the consequences of transfer escape are low to moderate.	regulated articles for observation and research or for further inspection, testing and/or treatment.	
		2 nd Sentence	Substantive		Section 2.2.1.5 transfer to a suitable host – "escape" in itself is not bad but transferring to a suitable host is bad.	
3.1.2 Physical requirements, PEQ1	[49]					
3.1.2 Physical requirements, PEQ1	[50]	New para	susbtantive	Quarantine moat can be constructed around the PEQ to prevent crawling insects from entering the station There is a need to have a footbath at the entrance of the station. PEQ station will have to be fenced	Essential requirments in any PEQ stations	PPPO
3.1.3 Operational requirements, PEQ1	[51]					
3.1.3 Operational requirements, PEQ1	[52]	New 2nd sentence	substantive	Only accessible to authorised visitors.	Essential requirement	PPPO
3.2 PEQ containment level 2	[53]		Substantive	PEQ <u>quarantine</u> containment level 2	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation	PPPO

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
					and research or for further inspection, testing and/or treatment.	
3.2.1 Type of facility and use, PEQ2	[54]					
3.2.1 Type of facility and use, PEQ2	[55]	2 nd sentence	Substantive	PEQ2 facilities are suited for consignments of plants for planting that	see previous comments	PPPO
		3 rd sentence	Substantive	There may be a moderate to high probability of transfer to a suitable host risk of escape of the pest, but the corresponding consequences of establishment escape are moderate to low, respectively.	Use ISPM 11 language – see previous comments regarding transfer and establishment.	
3.2.2 Physical requirements, PEQ2	[56]					
3.2.2 Physical requirements, PEQ2	[57]	End of 2 nd sentence		Waste water treatment facilities should be present.	Physical requirement necessary for operational requirements.	PPPO
3.2.2 Physical requirements, PEQ2	[58]	1 st sentence	Substantive	into PEQ2 facilities should be through two doors separated by a vestibule or anteroom to reduce	Seems to be inconsistent with 1sts sentence of para 55 that notes that there is "no special design features for the PEQ facility" where as this sentence includeds "two doors seperated by a vestibule or anteroom"	PPPO
3.2.2 Physical requirements, PEQ2	[59]					
3.2.3 Operational requirements, PEQ2	[60]					
3.2.3 Operational requirements, PEQ2	[61]	Bracketed	Subst.	change 'pasteurised' to sterilized potting mix	accuracy	PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.2.3 Operational requirements, PEQ2	[62]	1st sentence New sentences 2nd	substantive substantive	All PEQ staff and authorised visitors Equipments and protective clothing used in the PEQ station should not be removed. In cases where these materials require cleaning these should be sterilized or decontaminated before removal from the station. Waste and equipment (e.g cutting implements) should sterilized or decontainated	clarity	PPPO
3.3 PEQ containment level 3	[63]		Substantive	PEQ quarantine containment level 3	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
3.3.1 Type of facility and use, PEQ3	[64]					
3.3.1 Type of facility and use, PEQ3	[65]	1 st sentence 3 rd sentence	Substantive Substantive	The physical and operational requirements for PEQ3 facilities containment are substantially more stringent than those for lower levels. PEQ3 facilities may consist of a contained and secure glasshouse or laboratory. They are suited for quarantine containment of consignments of plants for planting where there is a moderate to high probability of transfer to a suitable host escape and where the consequences of the pest establishing an escape would be serious (e.g. aphidtransmitted viruses).	Para 44 notes that each level incorporates the requirements from the previous levels and therefore this sentence is not needed. See comments previous	PPPO
3.3.2 Physical requirements,	[66]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
PEQ3						
3.3.2 Physical requirements, PEQ3	[67]	Add to end	Subst	Where crawling pests are a problem, a quarantine moat can be constructed around the facility	To take account of particular conditions	PPPO
3.3.2 Physical requirements, PEQ3	[68]	1 st sentence	technical	Doors opening to the anteroom of the PEQ facility should be self-closing and tight fitting, with appropriate seals and sweeps.	Text added to make it consistent with Para 58 above	
3.3.2 Physical requirements, PEQ3	[69]	1st sentence	editorial	Delete (HVAC)	Unnecessary	PPPO
3.3.2 Physical requirements, PEQ3	[70]	New 2nd sentence	substantive	A dark room to trap flying insects might be required to separate a high risk PEQ room from a moderate risk room from where negative air pressure differential system is not available.	Essential requirement	PPPO
3.3.3 Operational requirements, PEQ3	[71]					
3.3.3 Operational requirements, PEQ3	[72]					
3.3.3 Operational requirements, PEQ3	[73]					
3.3.3 Operational requirements, PEQ3	[74]	2 nd sentence	Substantive	If consignments are removed from the PEQ facility they should be free of quarantine pests.	Section 2.4 of this draft includes guidance on the release of consignments from quarantine.	PPPO
3.4 PEQ containment level 4	[75]		Substantive	PEQ <u>quarantine</u> containment-level 4	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
3.4.1 Type of facility and use, PEQ4	[76]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.4.1 Type of facility and use, PEQ4	[77]		Substantive	PEQ4 facilities provide the highest quarantinecontainment level. These facilities are designed and operated specifically to contain consignments of plants for planting in quarantine (whether deliberately imported or associated pests) where both the risk of transfer to a suitable host escape and the consequences of establishment escape are high (e.g. airborne plant pathogenic fungi).	see previous explanations	PPPO
3.4.2 Physical requirements, PEQ4	[78]					
3.4.2 Physical requirements, PEQ4	[79]					
3.4.2 Physical requirements, PEQ4	[80]	2 nd sentence	Substantive	To maintain <u>quarantine</u> containment, the vestibule doors	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
3.4.2 Physical requirements, PEQ4	[81]					
3.4.2 Physical requirements, PEQ4	[82]					
3.4.2 Physical requirements, PEQ4	[83]					
3.4.3 Operational requirements, PEQ4	[84]					
3.4.3 Operational requirements, PEQ4	[85]					
3.4.3 Operational requirements, PEQ4	[86]	2nd sentence	subst	This facility should not be accessible to the general public	Moved to elsewhere	PPPO
3.4.3 Operational	[87]		_			_

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
requirements, PEQ4						
ANNEX 1	[88]					
ANNEX 1: TITLE	[89]		Substantive	METHODS FOR ASSIGNMENT OF PEQ QUARANTINE CONTAINMENT LEVELS	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
ANNEX 1: TEXT	[90]	1 st and 2 nd sentence	Substantive	Several approaches can be used to assign quarantine containment levels of PEQ facilities. The PEQ quarantine containment requirements will depend on the specific organism and other circumstances in the country e.g. climatic, environmental identified during the PRA.	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
ANNEX 1: TEXT	[91]		Substantive	The quarantine containment levels are described in a matrix that combines the likelihood of pest transfer to a suitable host introduction and establishment with the consequence of their establishment (see Table 1). Factors that may be considered in determining the probability risk of pest transfer to suitable host are listed in ISPM 11 (section 2.2.1.5) introduction is a function of the size of the organism, dispersal method, reproductive potential, potential for establishment etc., while the consequences of pest establishment relate to impact on the environment, trade implications, economic factors etc. ISPM No. 11 (Pest risk analysis for quarantine pests including analysis of environmental risks and living modified	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment. Section 2.2 of ISPM 11 notes that introduction comprises both entry and establishment. The use of introduction here should probably be "transfer to a suitable host" as the entry will occur because the consignment is moving into PEQ.	PPPO

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				organisms) provides guidelines for pest risk assessment.		
ANNEX 1: TABLE 1	[92]	Column 1	Substantative	Risk Likelihood of escape transfer and establishment	Accurate use of language	PPPO
		Column 2	Subst.	Consequence of escape transfer and estblishment		
ANNEX 1: TEXT	[93]		Substantive	Other approaches may be used to designate quarantine containment levels that are more directly based on specific biological characteristics of the organism likely to be present in the consignment or based a group of pests with similar biological characteristics (e.g. airborne fungi).	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment. Notes that a PEQ facility can be established for groups of pests	PPPO
APPENDIX 1	[94]					
APPENDIX 1: TITLE	[95]		Substantive	BY QUARANTINE CONTAINMENT LEVEL	Containment is a defined term Application of phytosanitary measures in and around an infested area to prevent the spread of pest. the correct term here is probably "quarantine" official confinement of regulated articles for observation and research or for further inspection, testing and/or treatment.	PPPO
APPENDIX 1: TABLE	[96]	Sub-heading to Column1	editorial	Physical requirements Operational requirements	Redundant	PPPO
			substantative	Physical requirements - footpath required for all PEQ levels: na, R, R, R,R - fencing around station around PEQ: R,R,R,R,O - moat is required for PEQ: O,R,R,R,O	Correction.	PPPO

1. Section	1	3. sentence/ row/indent, etc.	~ ~	5. Proposed rewording	6. Explanation	7. Country
				Signage: R, R, R, RShower is required in: na, O, O, R, R		
				Re waste water treatment for PEQ3 should be R not R^*	Consistency with text.	PPPO
			Subst.	Add new item "growing médium" in Operational Requirements. Abbreviations should be na,O,R,R, R.		PPPO

Template for comments - Draft ISPMs for country consultation, 2008-Southwest Pacific/PPPO

DRAFT 7/7: PEST FREE POTATO MICROPROPAGATIVE MATERIAL AND MINITUBERS FOR INTERNATIONAL TRADE

See <u>instructions</u> on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS						PPPO
SPECIFIC COMMENTS						
TITLE	[1]					
CONTENTS	[2]					
INTRODUCTION	[3]					
SCOPE	[4]					
SCOPE	[5]	1st line	Substantive	insert 'phytosanitary certification of pest free'	Accuracy	PPPO
		2nd line	substantive	pest free potato (Solanum tuberosum and related tuber-forming species) ¿?????	Clarity of coverage of Standard??????	
SCOPE	[6]					
REFERENCES	[7]					
REFERENCES	[8]					
REFERENCES	[9]					
REFERENCES	[10]					
REFERENCES	[11]					
REFERENCES	[12]	new ref	Substantive	Include reference to ISPM 2		PPPO
DEFINITIONS	[13]					
DEFINITIONS	[14]		editorial	Definitions of phytosanitary terms used in this the present standard can		PPPO

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
DEFINITIONS	[15]					
DEFINITIONS	[16]					
DEFINITIONS	[17]					
DEFINITIONS	[18]		Substantive	A tuber produced in a protected facility from	Environment considered too inclusive a term. [Note: "protected environment" is used trwice in ISPM No. 11 sections 2.2.2 and 2.2.2.2 . 2.2.2 says "such as glass- or greenhouse"	PPPO
DEFINITIONS	[19]					
OUTLINE OF REQUIREMENTS	[20]					
OUTLINE OF REQUIREMENTS	[21]					
OUTLINE OF REQUIREMENTS	[22]					
OUTLINE OF REQUIREMENTS	[23]					
OUTLINE OF REQUIREMENTS	[24]	2 nd sentence	Substantive	facilities should be <u>inspected</u> officially examined to ensure that each lot	See definition in ISPM 5 for inspection – trying to avoid the use of new terms.	PPPO
BACKGROUND	[25]					
BACKGROUND	[26]	2 nd last sentence	Substantive	Potato micropropagative material can be multiplied under specified regulated protected conditions to produce minitubers.	Is this the same as "protected environment" in the definition for minituber? should be consistent use of terms.	PPPO
		last sentence	substantive	Provided that minituber production is carried out under pest free conditions, utalising pest free micropropagitive material,	Need to highlight that the quality of the material entering the system has been tested and found free of regulated pests.	
REQUIREMENTS	[27]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
1. Responsibilities	[28]					
1. Responsibilities	[29]	2nd sentence	substantive	The phytosanitary aspectsscheme should be officially audited.	Consistency with para 24	PPPO
2. Pest Risk Analysis	[30]					
2. Pest Risk Analysis	[31]	2 nd sentence	Substantive	accordance with ISPMs No. 2 (Framework for pest risk analysis) and No. 11 (Pest risk analysis for quarantine pests including analysis of environmental risks and living modified organisms, 2004)	Accuracy	PPPO
2.1 Pathway-specific lists of potato pests	[32]					
2.1 Pathway-specific lists of potato pests	[33]					
2.2 Risk management options	[34]	title	substantive	Pest risk management options	Consistency with existing terminlogy	PPPO
2.2 Risk management options	[35]	1st line	substantive	pest risk management measures	as above	PPPO
2.2.1 Potato micropropagative material	[36]					
2.2.1 Potato micropropagative material	[37]	1st sentence	editorial	insert 'pest' risks	As above	PPPO
2.2.2 Minitubers	[38]					
2.2.2 Minitubers	[39]	1st sentence	editorial	pest risks	as above	PPPO
3. Production of Pest Free Potato Micropropagative Material	[40]					
3.1 Establishment of pest free	[41]					
3.1 Establishment of pest free	[42]					
3.1.1 Testing	[43]					

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.1.1 Testing	[44]					
3.1.2 Secure phytosanitary environment	[45]	title	Edit	Facilities	Paragraph describes the requirements for the facilities.	PPPO
3.1.2 Secure phytosanitary environment	[46]					
3.2 Maintenance and propagation of	[47]					
3.2 Maintenance and propagation of	[48]					
3.3 Combined establishment and	[49]					
3.3 Combined establishment and	[50]					
3.3 Combined establishment and	[51]					
3.3 Combined establishment and	[52]					
3.3 Combined establishment and	[53]					
4. Production of Pest Free Minitubers	[54]	whole section	substantive		This section should follow the same format as the preceding section, that is, test, production standards, maintenance, etc	PPPO
4. Production of Pest Free Minitubers	[55]					
4. Production of Pest Free Minitubers	[56]					
4. Production of Pest Free Minitubers	[57]					
4. Production of Pest Free Minitubers	[58]					
4. Production of Pest Free Minitubers	[59]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
4. Production of Pest Free Minitubers	[60]					
4. Production of Pest Free Minitubers	[61]					
4. Production of Pest Free Minitubers	[62]					
4. Production of Pest Free Minitubers	[63]					
5. Staff Competence	[64]					
5. Staff Competence	[65]					
5. Staff Competence	[66]		substantive	Records of staff training and competencies should be maintained as determined by the NPPO of the exporting country as agreed with the importing contracting party.	need agreement of the importing NPPO that the records are adequate	PPPO
6. Documentation	[67]					
6. Documentation	[68]					
6. Documentation	[69]	New sub- heading	Editorial	New Sub-heading 6.1 Records	To differentiate documentation from records. Consistent with other ISPMs	PPPO
7. Auditing	[70]					
7. Auditing	[71]					
7. Auditing	[72]	At end of sentence	Susbst.	based on a bilateral arrangement.	To avoid disagreements.	PPPO
8. Official Verification of Pest Freedom	[73]					
8. Official Verification of Pest Freedom	[74]					
8. Official Verification of Pest Freedom	[75]					
9. Certification	[76]					
9. Certification	[77]					

1. Section	2. Para nber	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
ANNEX 1	[78]					
ANNEX 1: TITLE	[79]					
ANNEX 1: TEXT	[80]					
ANNEX 2	[81]					
ANNEX 2: TITLE	[82]					
ANNEX 2: TEXT	[83]					
ANNEX 2: TEXT	[84]					
ANNEX 3	[85]					
ANNEX 3: TITLE	[86]					
ANNEX 3: TEXT	[87]					
ANNEX 3: Physical structure	[88]	New dash point	substantive	In places where there is unreliable supply of electricity and water standby facilities must be available in case of emergencies	Essential requirement	PPPO
ANNEX 3: Environment controls	[89]	Change of title	substantive	Management of environment	Clarity.	PPPO
ANNEX 3: Crop management	[90]					
ANNEX 3: Growing media, fertilizer, water	[91]					
ANNEX 3: Post harvest handling	[92]					
ANNEX 3: TEXT	[93]					
APPENDIX 1	[94]					
APPENDIX 1: TITLE	[95]					
APPENDIX 1: TABLE	[96]	Row 50			Saq'O - What is it???	PPPO
APPENDIX 2	[97]					
APPENDIX 2: TITLE	[98]					
APPENDIX 2: TEXT	[99]					
APPENDIX 2: Bacteria	[100]					

1. Section	1	3. sentence/ row/indent, etc.	~ ~	5. Proposed rewording	6. Explanation	7. Country
APPENDIX 2: Fungi	[101]					
APPENDIX 2: Insects	[102]					
APPENDIX 2: Nematodes	[103]					
APPENDIX 2: Protozoa	[104]					