Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[1]	G	Substantive		We would like to express our concern about the scope of this draft annex. We would like to point out the contradiction detected in Specification 44, where in the section “Reason for the Standard” it refers to an increase of international trade in plants for growing which can be interpreted as "plants for planting" whereas in the section “scope” and the rest of the specification, it refers to "plants". The EWG developed the draft considering the scope of the specification, including in this annex all plants and not only “plants for planting”. We think that it is applicable mainly to "plants for planting". In this regard the annex emphasizes the higher risk of "plants for planting". Categories of uses within "plants for planting" are described according to risk. Additionally guidelines given in this draft annex regarding "plants" other than "plants for planting" are not additional to the guidelines given in section 2.2 of ISPM 11. The version in Spanish has a lot of problems with translation. We detected for example the following terms mistakenly translated in the context of this draft: "landscape" translated as "paisaje", "parents" as "parientes", etc. Additionally, "alien" should be translated into Spanish as "no autóctono", as suggested in appendix 1 of ISPM 5. As the term horticultural (paragraph 25, 27 and 31) includes fruits, vegetables and ornamentals it cannot be translated into Spanish as "hortícolas" because the term "hortícolas" in Spanish only includes vegetables We do not agree to introduce the term "location" in this annex. Location is not a glossary term and its meaning and applicability are not clear. Additionally PRA is only conducted for a defined area (PRA area).	Costa Rica ,Nicaragua
[2]	G	Substantive		We would like to express our concern	Uruguay

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				about the scope of this draft annex. We would like to point out the contradiction detected in Specification 44, where in the section “Reason for the Standard” it refers to an increase of international trade in plants for growing, which can be interpreted as “plants for planting”, whereas in the section “Scope” and the rest of the specification it refers to “plants”. The EWG developed the draft considering the scope of the specification, including in this annex all “plants” and not only “plants for planting”. We think that it is applicable mainly to “plants for planting”. In this regard the annex emphasizes the higher risk of “plants for planting”. Categories of uses within “plants for planting” are described according to risk. Additionally guidelines given in this draft Annex regarding “plants” other than “plants for planting” are not additional to the guidelines given in section 2.2 of ISPM 11. The version in Spanish has a lot of problems with translation. We detected for example the following terms mistakenly translated in the context of this draft: “landscape” translated as “paisaje”, “parents” as “parientes”; etc. Additionally “Alien” should be translated into spanish as “no autóctono”, as suggested in appendix 1 of ISPM 5 As the term horticultural (paragraphs 25, 27 and 31) includes fruits, vegetables and ornamentals it can not be translated into spanish as “hortícolas” because the term “hortícolas” in spanish only includes vegetables. We do not agree to introduce the term “location” in this annex. Location is not a glossary term and its meaning and applicability are not clear. Additionally PRA is only conducted for a defined area (PRA area).	
[3]	G	Substantive		We express our concern about the scope of this draft annex, considering the	COSAVE,Paraguay ,Chile,Brazil

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				contradiction detected in Specification 44 where in the reason for the Standard it refers to the increase of plants for growing moving in international trade, which can be interpreted as “plants for planting”, whereas in the scope and the rest of the specification it refers to “plants”. The EWG developed the draft considering the scope of the specification and thus including in this annex all “plants” and not only “plants for planting”. Although the draft annex covers “plants”, as specified in the specification, we think that it is applicable mainly to “plants for planting”. In this regard the annex emphasized the higher risk of “plants for planting” and categories of uses within “plants for planting” are described according risk. Additionally guidelines given in this draft Annex in connection to “plants” other than “plants for planting” are not additional to the guidelines already given in section 2.2 of ISPM 11. “Alien” should be translated into spanish as “no autóctono”, as suggested in appendix 1 of ISPM 5 As the term horticultural (paragraph 25, 27 and 31) includes fruit vegetables ornamentals can not be translated into spanish as “hortícolas” because the term “hortícolas” in spanish only includes vegetables. We do not agree to introduce the term “location” in this annex. Location is not a glossary term and it is not clear its meaning and applicability, considering in addition that PRA is conducted for a defined area.	
[4]	G	Substantive	Impacts of plants as pests need to be expanded	In general, ISPM 11 states that an NPPO can assess the risk of a plant escaping to a habitat from where it is planted. This may not always be the case as the endangered area may not be the same habitat.	United States of America
[5]	G	Substantive	As a general comment in all text replace the word “location” by “habitat” because "habitat" is a term already defined in ISPM No. 5.		Mexico

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[6]	G	Substantive	Add the part of SCOPE to clarify in which situation PRA of plants as pests have to be considered, and in which situation not need to be considered.	It is need to be clear for which commodity PRA of plants as pests necessary.	China
[7]	G	Substantive		We express our concern about the scope of this draft annex, considering the contradiction detected in Specification 44 where in the reason for the Standard it refers to the increase of plants for growing moving in international trade, which can be interpreted as “plants for planting”, whereas in the scope and the rest of the specification it refers to “plants”. The EWG developed the draft considering the scope of the specification and thus including in this annex all “plants” and not only “plants for planting”. Although the draft annex covers “plants”, as specified in the specification, we think that it is applicable mainly to “plants for planting”. In this regard the annex emphasized the higher risk of “plants for planting” and categories of uses within “plants for planting” are described according risk. Additionally guidelines given in this draft Annex in connection to “plants” other than “plants for planting” are not additional to the guidelines already given in section 2.2 of ISPM 11. “Alien” should be translated into spanish as “no autóctono”, as suggested in appendix 1 of ISPM 5 As the term horticultural (paragraph 25, 27 and 31) includes fruit vegetables ornamentals can not be translated into spanish as “hortícolas” because the term “hortícolas” in spanish only includes vegetables. We do not agree to introduce the term “location” in this annex. Location is not a glossary term and it is not clear its meaning and applicability, considering in addition that PRA is conducted for a defined area	Argentina
[8]	G	Substantive	There is a great deal of the proposed text which is a repeat or only minor modification of the existing ISPM 2 (2007) or ISPM 11 (2006) texts and as such what additional guidance it provides, or if the intent was to		Canada

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			create a stand-alone document for plants as pests. If the latter is the case, the document does that well. Efforts should be made to minimize repetition from ISPMs 2 or 11. For example [43] - [45], and [59] contain very little new information that cannot be found in ISPM 11. Other information in the proposed text (e.g., [27] and [69] - [71]) are more detailed and instructional than what is usually seen in ISPMs; this is the type of information which is often contained in explanatory documents rather than in the standards themselves, and may be more than we wish to see in a standard, given the status of such standards under the WTO-SPS. One of the most challenging aspects of regulating plants as pests arises from the fact that many plants are intentionally imported for beneficial purposes (e.g., as crops, medicinal plants, ornamentals, erosion control, etc) in addition to having the potential to be pests. The draft Annex 4 of ISPM 11 provides very little guidance on how to balance positive and negative potential impacts. Current wording in the Risk Management section of the Annex suggests that perceived benefits may be considered in a decision process following the PRA (Stage 3, para 61). It could equally be argued that benefits could be considered in the risk management stage of PRA, as countries make regulatory decisions about particular plants. Canada does not think that this needs to be resolved prior to the completion of Annex 4, but suggests that the IPPC should consider developing further guidance to address this particular issue.		
[9]	G	Substantive	We would like to express our concern about the scope of this draft annex. We would like to point out the contradiction detected in Specification 44, where in the section “Reason for the Standard” it refers to an increase of international trade in plants for growing, which can be interpreted as “plants for planting”, whereas in the section “Scope” and the rest of the specification it refers to “plants”. The EWG developed the draft considering the scope of the specification, including in this annex all “plants” and not only “plants for planting”. We think that it is applicable mainly to “plants for planting”. In this regard the annex emphasizes the higher risk of “plants for planting”. Categories of uses within “plants for planting” are described according to risk. Additionally guidelines given in this draft Annex regarding “plants” other than “plants for planting” are not additional to the guidelines given in section 2.2 of ISPM 11. We do not agree to introduce the term “location” in this annex. Location is not a glossary term and its meaning and applicability are not clear. Additionally PRA is only conducted for a defined area (PRA area).		El Salvador
[10]	G	Substantive	We would like to express our concern about the scope of this draft annex. We would like to point out the contradiction detected in Specification 44, where in the section “Reason for the Standard” it refers to an increase of		OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			international trade in plants for growing, which can be interpreted as “plants for planting”, whereas in the section “Scope” and the rest of the specification it refers to “plants”. The EWG developed the draft considering the scope of the specification, including in this annex all “plants” and not only “plants for planting”. We think that it is applicable mainly to “plants for planting”. In this regard the annex emphasizes the higher risk of “plants for planting”. Categories of uses within “plants for planting” are described according to risk. Additionally guidelines given in this draft Annex regarding “plants” other than “plants for planting” are not additional to the guidelines given in section 2.2 of ISPM 11. We do not agree to introduce the term “location” in this annex. Location is not a glossary term and its meaning and applicability are not clear. Additionally PRA is only conducted for a defined area (PRA area).		
[11]	G	Technical	Suggest to delete the part related to LMO from ISPM 11, or modify the part to make it easy to use in practic	the part for LMO in ISPM11 is not useful in practice and hard for member countries to follow up.	China
[12]	G	Translation	Alien should be translated into Spanish as "no autóctono" as is suggested in appendix 1 of ISPM No. 5		Mexico
[13]	G	Translation	The version in Spanish has a lot of problems with translation. We detected for example the following terms mistakenly translated in the context of this draft: “landscape” translated as “paisaje”, “parents” as “parientes”; etc. Additionally “Alien” should be translated into spanish as “no autóctono”, as suggested in appendix 1 of ISPM 5 As the term horticultural (paragraph 25, 27 and 31) includes fruits, vegetables and ornamentals it can not be translated into spanish as “hortícolas” because the term “hortícolas” in spanish only includes vegetables.		El Salvador
[14]	G	Translation	The version in Spanish has a lot of problems with translation. We detected for example the following terms mistakenly translated in the context of this draft: “landscape” translated as “paisaje”, “parents” as “parientes”; etc. Additionally “Alien” should be translated into spanish as “no autóctono”, as suggested in appendix 1 of ISPM 5 As the term horticultural (paragraph 25, 27 and 31) includes fruits, vegetables and ornamentals it can not be translated into spanish as “hortícolas” because the term “hortícolas” in spanish only includes vegetables.		OIRSA
[15]	9	Editorial	**Introduction**	Correct use of punctuation in the Spanish language, change in the spanish version:	Mexico

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				"Introducción" instead of "Introduccion"	
[16]	10	Editorial	This annex provides additional guidance for a conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	Connecting to ISPM 11 core text. Better wording.	EPPO,Ukraine ,Morocco ,Uzbekistan
[17]	10	Editorial	The import of plant material may involve two types of risk. The plant material itself may be a pest, including invasive alien species, or the plant may be infested with plant pests. In the instance of a plant possibly being a pest, a country, while assessing the possible pest status of a plant, will also have to evaluate the benefits associated with the import. These could involve a range of issues from food benefits, to the environmental or cultural significance of the plant to the population or part of the population of the country. Where there are the two types of risk involved, the risk associated with the plant as a pest may be assessed first. Following this would be the assessment of the risk of plant pest carried by plant material. This will include the assessment of all other pests such as insects, mites, and pathogens. This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	The purpose of this annex and the characteristics of the plant as pest should be addressed	Korea, Republic of
[18]	10	Editorial	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses ~~primarily~~ on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	If it is focused on plants proposed for import the term "primarily" is redundant.	Costa Rica ,Nicaragua ,El Salvador
[19]	10	Editorial	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses ~~primarily~~ on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	If it is focused on plants proposed for import, the term primarily is redundant	Uruguay
[20]	10	Editorial	This annex provides guidance for conducting pest risk analysis (PRA) to	Clearer wording and to avoid redundance	Mexico

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses ~~primarily~~ on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.		
[21]	10	Editorial	This annex provides additional guidance for conducting a pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	Connecting to ISPM 11 core text. Better wording.	European Union
[22]	10	Editorial	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for intentional import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	Clarifies the scope of the supplement and removes any ambiguity.	Canada
[23]	10	Editorial	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses ~~primarily~~ on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	If it is focused on plants proposed for import, the term primarily is redundant	OIRSA
[24]	10	Editorial	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses ~~primarily~~ on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	If it is focused on plants proposed for import the term "primarily" is redundant.	Brazil
[25]	10	Substantive	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for import , whether as plants for plating, consumption or processing, and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	To clearly identify the scope of the annex to a number of possible end uses. References to other end uses (other than plants for planting) aren't immediately obvious until much further into the annex, most notably in paragraphs 32 and 64	Australia
[26]	10	Substantive	The import of plant material may involve two types of risk. The plant material itself may be a pest, including invasive alien species, or the plant may be infested with plant pests. In the instance of a plant possibly being a pest, a	The purpose of this annex and the characteristics of the plant as pest should	Philippines ,Lao People's Democratic

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			country, while assessing the possible pest status of a plant, will also have to evaluate the benefits associated with the import. These could involve a range of issues from food benefits, to the environmental or cultural significance of the plant to the population or part of the population of the country. Where there are the two types of risk involved, the risk associated with the plant as a pest may be assessed first. Following this would be the assessment of the risk of plant pest carried by plant material. This will include the assessment of all other pests such as insects, mites, and pathogens. This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	be addressed	Republic,Japan ,India
[27]	10	Substantive	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances. A PRA does not need to be done on plants that are already being imported, if the plant is widespread, or if the plant is only suited for certain areas that are not endangered, unless new information is available that shows the plant could become a pest.	Add a sentence at the end or begin a new paragraph. This section should mention that PRA may not need to be done if it is already widespread or if it is clearly only suited for certain areas that are not of concern or list reasons why a PRA would be done. The current way this is written, NPPOs may start to do PRAs on every plant, even if it's already present, etc. There has to be an out clause that states that PRAs do not need to be done on plants that are already being imported, etc. unless there is new information available that shows that this could potential become a plant pest.	United States of America
[28]	10	Substantive	The import of plant material may involve two types of risk. The plant material itself may be a pest, including invasive alien species, or the plant may be infested with plant pests. In the instance of a plant possibly being a pest, a country, while assessing the possible pest status of a plant, will also have to evaluate the benefits associated with the import. These could involve a range of issues from food benefits, to the environmental or cultural significance of the plant to the population or part of the population of the country. Where there are the two types of risk involved, the risk associated with the plant as a pest may be assessed first. Following this would be the		Viet Nam

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			assessment of the risk of plant pest carried by plant material. This will include the assessment of all other pests such as insects, mites, and pathogens. This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify appropriate phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.		
[29]	10	Technical	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify ~~appropriate~~ phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	It is not appropiate to qualify phytosanitary measures.	Costa Rica ,Nicaragua ,El Salvador
[30]	10	Technical	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify ~~appropriate~~ phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	It is not appropriate to qualify phytosanitary measures.	Uruguay
[31]	10	Technical	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify ~~appropriate~~ phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	It is not appropriate to qualify Phytosanitary measures.	COSAVE,Paraguay ,Chile,Brazil
[32]	10	Technical	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify ~~appropriate~~ phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	[5] It is not appropriate to qualify Phytosanitary measures.	Argentina
[33]	10	Technical	This annex provides guidance for conducting pest risk analysis (PRA) to determine if a plant is a pest of cultivated plants or wild flora, whether it should be regulated, and to identify ~~appropriate~~ phytosanitary measures. It focuses primarily on plants proposed for import and does not cover the unintentional introduction of plants as contaminants in commodities or conveyances.	It is not appropriate to qualify Phytosanitary measures.	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[34]	11	Editorial	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant as pest, ~~species themselves or~~ in particular the pest risk ~~for~~ to plants in natural and semi-natural habitats requires specific consideration.	Consistently using the proper term 'plant as pest'. Clarifying relation between plants as pests and concerns on natural habitats.	EPPO,Ukraine ,Morocco ,Uzbekistan
[35]	11	Editorial	The number and diversity of plants being moved between and in countries are ~~is~~ increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, ~~pest~~ risk posed by the plant species themselves or pest risk for plants in natural and semi-natural habitats requires specific consideration.		Indonesia
[36]	11	Editorial	The number and diversity of plants being moved between and in countries are ~~is~~ increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species themselves or pest risk for plants in natural and semi-natural habitats requires specific consideration.		Thailand
[37]	11	Editorial	The number and diversity of plants being moved between and in countries are ~~is~~ increasing as opportunities for trade increase and markets develop for new plants~~. The risk of introducing new pests with plants as a pathway has long~~ been recognized and widely regulated. However, ~~pest~~ risk posed by the plant species themselves or ~~pest risk for plants in natural and semi-natural habitats~~ requires specific regulation ~~consideration~~.		Korea, Republic of
[38]	11	Editorial	The number and diversity of plants being moved between and in countries are ~~is~~ increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, ~~pest~~ risk posed by the plant species themselves or pest risk for plants in natural and semi-natural habitats requires specific regulation ~~consideration~~.		Lao People's Democratic Republic,Japan ,Viet Nam ,India
[39]	11	Editorial	The number and diversity of plants being moved within and between ~~and in~~ countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species themselves or pest risk for plants in natural and semi-natural habitats requires specific consideration.	Proposed changes makes the paragraph more clear	Kenya
[40]	11	Editorial	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new	Consistently using the proper term 'plant as pest'. Clarifying relation between plants as	European Union

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant as pest, ~~species themselves or~~ in particular the pest risk ~~for~~ to plants in natural and semi-natural habitats requires specific consideration.	pests and concerns on natural habitats.	
[41]	11	Substantive	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species themselves or pest risk for plants in ~~natural and semi-natural~~ their habitats requires specific consideration.	The words “natural and semi-natural” are later elaborated on the document, hence the suggestion to remove them on this paragraph.	South Africa
[42]	11	Technical	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species ~~themselves or pest risk~~ for plants in arable lands in natural and semi-natural habitats in the PRA area requires specific consideration.	To be consistent with ISPM 2 item 1.2.1 As this is an Annex of ISPM 11 reference to the PRA area should be made.	Costa Rica ,Brazil
[43]	11	Technical	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species ~~themselves or pest risk~~ for plants in arable lands, natural and semi-natural habitats in the PRA area requires specific consideration.	To be consistent with ISPM 2 item 1.2.1. As this is an Annex of ISPM 11 reference to the PRA area should be made.	Uruguay
[44]	11	Technical	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species ~~themselves or pest risk~~ for plants in arable lands, natural and semi-natural habitats in the PRA area requires specific consideration.	To be consistent with ISPM 2 item 1.2.1. As this is an annex of ISPM 11 reference to the PRA area should be made.	COSAVE,Paraguay ,Chile
[45]	11	Technical	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species ~~themselves or pest risk~~ for plants in natural and semi-natural habitats in the pest risk area requires specific consideration ~~.~~	To be consistent with ISPM 2 item1.2.1. As this is an Anex of ISPM11 reference to the PRA area should be made	Mexico
[46]	11	Technical	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species ~~themselves or pest risk~~ for plants in arable landsnatural and semi-	[6] To be consistent with ISPM 2 item 1.2.1. As this is an annex of ISPM 11 reference to the PRA area should be made.	Argentina

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			natural habitats in the PRA area requires specific consideration.		
[47]	11	Technical	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species ~~themselves or pest risk~~ for plants in arable lands in natural and semi-natural habitats in the PRA area requires specific consideration.	To be consistent with ISPM 2 item 1.2.1 As this is an Annex of ISPM 11 reference to the PRA area should be made.	Nicaragua
[48]	11	Technical	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species ~~themselves or pest risk~~ for plants in arable lands, natural and semi-natural habitats in the PRA area requires specific consideration.	To be consistent with ISPM 2 item 1.2.1. As this is an annex of ISPM 11 reference to the PRA area should be made.	OIRSA
[49]	11	Translation	The number and diversity of plants being moved between and in countries is increasing as opportunities for trade increase and markets develop for new plants. The risk of introducing new pests with plants as a pathway has long been recognized and widely regulated. However, pest risk posed by the plant species themselves or pest risk for plants in natural and semi-natural habitats requires specific consideration.	The suggested translation to Spanish for the first sentence is: "El número y la diversidad de plantas que se movilizan entre países y dentro de ellos está aumentando de la misma forma que incrementan las oportunidades de comercio desarrollo de mercados para nuevas plantas" Explantion: For better understanding The suggested translation to Spanish for the third (last) sentence is: "Sin embargo, requiere consideración específica el riesgo de plaga que representan las especies de plantas por si mismas o el riesgo de plagas para las plantas en hábitats naturales y seminaturales" Explantion: For better understanding	El Salvador
[50]	13	Editorial	Plants as pests may affect other plants through competition for ~~limited~~ resources, such as space, light, nutrients and water, or through parasitism or allelopathy. Plants new to an area may also become pests by hybridizing with cultivated plants or wild plants ~~in the wild flora~~.	1. Superfluous word: If resources were not limited, there would not be competition for them. 2. Better wording	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[51]	13	Editorial	Plants as pests may affect other plants through competition for ~~limited~~ resources, such as space, light, nutrients and water, or through parasitism or allelopathy. Plants new to an area may also become pests by hybridizing with cultivated plants or wild plants ~~in the wild flora~~.	1. Superfluous word: If resources were not limited, there would not be competition for them. 2. Better wording	European Union

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[52]	13	Substantive	Plants as pests may affect other plants through competition for limited resources, such as space, light, nutrients and water, or through parasitism or allelopathy. Plants introduced to a new ~~new to an~~ area may also become pests by hybridizing with cultivated plants or plants in the wild flora or transferring genetic materials through natural hybridization.		Indonesia
[53]	13	Substantive	Plants as pests may affect other plants through competition for limited resources, such as space, light, nutrients and water, or through parasitism or allelopathy. Plants introduced to a PRA ~~new to an a~~rea may also become pests by hybridizing with cultivated plants or plants in the wild flora or transferring genetic materials through natural hybridization.	For clarification of context.	Thailand ,Lao People's Democratic Republic,Japan ,Viet Nam ,India
[54]	13	Substantive	Plants as pests may affect other plants through competition for limited resources, such as space, light, nutrients and water, or through parasitism or allelopathy. Plants introduced to a PRA ~~new to an a~~rea may also become pests by hybridizing with cultivated plants or plants in the wild flora or transferring genetic materials through natural hybridization.		Korea, Republic of
[55]	13	Substantive	~~Plants as pests may affect other plants through competition for limited resources, such as space, light, nutrients and water, or through parasitism or allelopathy. Plants new to an area may also become pests by hybridizing with cultivated plants or plants in the wild flora.~~ Plants as pests may affect other plants through competition for limited resources, such as space, light, nutrients and water, or through parasitism or allelopathy. Plants as pests may also produce toxin or affect the enviornment by contaminating or damaging. Plants new to an area may also become pests by hybridizing with cultivated plants or plants in the wild flora.	Make It be more completely to the identification on plants as pests.	China
[56]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which plant species ~~should be deemed~~ are pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such a determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analyse~~i~~s may also require ~~analysis~~ assessments of their potential to be pathways for other pests.	Clarity	EPPO,Ukraine ,Morocco ,Uzbekistan
[57]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered	To clarify.	Costa Rica ,Nicaragua ,El Salvador

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also ~~require analysis of their potential to be pathways for other pests.~~ be subjected to a pest risk analisys by pathway.		
[58]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also ~~require analysis of their potential to be pathways for other pests.~~ be subjected to a pest risk analysis by pathway.	To clarify	Uruguay
[59]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also ~~require analysis of their potential to be pathways for other pests~~ be subjected to a pest risk analysis by pathway.	To clarify.	COSAVE,Paraguay ,Chile
[60]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking phytoasnitary measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also ~~require analysis of their potential to be pathways for other pests.~~ be subjected to a pest risk analysis by pathway	1.- To be consistent wit h paragraph 10 that refer phytosanitary measures. 2.- Clearer wording	Mexico
[61]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which plant species ~~should be deemed~~ are pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the	Clarity	European Union

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			endangered area. PRA should form the basis of such a determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also require ~~analysis~~ assessments of their potential to be pathways for other pests.		
[62]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also ~~require analysis of their potential to be pathways for other pests.~~be subjected to a pest risk analysis by pathway.	To clarify	Argentina
[63]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also ~~require analysis of their potential to be pathways for other pests~~ be subjected a pest risk analysis by pathway.	To clarify	OIRSA
[64]	14	Editorial	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also ~~require analysis of their potential to be pathways for other pests.~~ be subjected to a pest risk analisys by pathway.	To clarify.	Brazil
[65]	14	Technical	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking phytosanitary measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of	To be consistent with paragraph 10.	Costa Rica ,Nicaragua ,El Salvador ,Brazil

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also require analysis of their potential to be pathways for other pests.		
[66]	14	Technical	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking phytosanitary measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also require analysis of their potential to be pathways for other pests.	To be consistent with paragraph 10.	Uruguay
[67]	14	Technical	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking phytosanitary measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also require analysis of their potential to be pathways for other pests.	To be consistent to para 10.	COSAVE,Paraguay ,Chile
[68]	14	Technical	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking phytosanitary measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation of the plant species. It should be noted that plants having undergone such analysis may also require analysis of their potential to be pathways for other pests.	To be consistent to para 10.	Argentina
[69]	14	Technical	Thus, the protection of plants as pursued through the IPPC may include considering certain plant species as pests, and taking phytosanitary measures to prevent their introduction and spread. Determining which species should be deemed pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such determination and subsequent decisions regarding possible regulation	To be consistent with paragraph 10.	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			of the plant species. It should be noted that plants having undergone such analysis may also require analysis of their potential to be pathways for other pests.		
[70]	15	Editorial	The IPPC has recognized the importance of plants as pests by underscoring that the definition of “pest” includes weeds (ICPM, 2001), and by specifically including “plants that are invasive alien species” in a range of recommendations for action for those invasive alien species that are pests of plants (ICPM, 2005).	Combine paragraphs 15 and 16 together. The two paragraphs are discussing the same topic and should be combined.	United States of America
[71]	15	Technical	The IPPC has recognized the importance of plants as pests by underscoring that the definition of “pest” includes weeds (ICPM, 2001), and by specifically including “plants that are invasive alien species” in a range of recommendations for action for those invasive alien species that are pests of plants (ICPM, 2005). This Annex provides some specific guidance on how to apply these recommendations. The 2004 revision of ISPM 11 addressed some specific elements of conducting a PRA for plants as pests that are further elaborated in this Annex.	More explicitly relating this Annex to the CPM recommendations referred to. Relating this Annex to the 2004 revision of core text.	EPPO,Norway ,Ukraine ,Morocco ,Uzbekistan
[72]	15	Technical	The IPPC has recognized the importance of plants as pests by underscoring that the definition of “pest” includes weeds (ICPM, 2001), and by specifically including “plants that are invasive alien species” in a range of recommendations for action for those invasive alien species that are pests of plants (ICPM, 2005). This Annex provides some specific guidance on how to apply these recommendations. The 2004 revision of ISPM 11 addressed some specific elements of conducting a PRA for plants as pests that are further elaborated in this Annex.	More explicitly relating this Annex to the CPM recommendations referred to. Relating this Annex to the 2004 revision of core text.	European Union
[73]	16	Editorial	The IPPC is concerned with pests injurious to cultivated ~~as well as~~ and wild plants (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].	Improved wording	EPPO,Ukraine ,Morocco ,Uzbekistan
[74]	16	Editorial	The IPPC is concerned with pests injurious to cultivated plants as well as wild flora ~~plants~~ (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].	To be consistent with paragraph 10.	Costa Rica ,Nicaragua ,El Salvador
[75]	16	Editorial	The IPPC is concerned with pests injurious to cultivated plants as well as wild ~~plants~~ flora (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered	To be consistent with paragraph 10	Uruguay

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].		
[76]	16	Editorial	The IPPC is concerned with pests injurious to cultivated as well as wild plants (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].	This paragraph should be combined with paragraph 15.	United States of America
[77]	16	Editorial	The IPPC is concerned with pests injurious to cultivated plants as well as wild ~~plants~~ flora (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].	To be consistent with paragraph 10.	Mexico
[78]	16	Editorial	The IPPC is concerned with pests injurious to cultivated ~~as well as~~ and wild plants (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].	Improved wording	European Union
[79]	16	Editorial	The IPPC is concerned with pests injurious to cultivated as well as wild plants (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered as pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].	To make the sentence read better	South Africa
[80]	16	Editorial	The IPPC is concerned with pests injurious to cultivated plants as well as wild ~~plants~~ flora (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”1[see paragraph 72].	To be consistent with paragraph 10.	OIRSA
[81]	18	Substantive	**Stage 1: Initiation** The PRA process for plants as pests will most frequently arise in situations such as: • a request is made or anticipated to import a plant not previously imported • a plant already available and used in a country which is suspected of	These initiation points are a (modified) selection of the long range already mentioned in the core ISPM 11, however it seems useful to highlight the most common reasons for specifically conducting a PRA	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			posing a pest risk • a decision is made to review or revise phytosanitary policies	for plants as pests.	
[82]	18	Substantive	**Stage 1: Initiation** The PRA process for a plant proposed for intentional import may be triggered in situations such as: - a request to import a plant species not previously imported - a decision to review or revise phytosanitary measures or policies based on new information.	There needs to be a categorization step in Stage 1: Initiation A categorization step is needed to determine if this pest is already here, that we are not importing it, etc. If a country is already allowing a plant to entry, it may not be necessary to do a pest risk assessment (although this may change if new information emerges or there are policy changes). It makes it clearer when a PRA for plants may be needed.	United States of America
[83]	18	Substantive	**Stage 1: Initiation** ***Initiation points (refer to section 1.1)*** The PRA process for plants as pests will most frequently arise in situations such as: • a request is made or anticipated to import a plant not previously imported • a plant already available and used in a country which is suspected of posing a pest risk • a decision is made to review or revise phytosanitary policies	These initiation points are a (modified) selection of the long range already mentioned in the core ISPM 11, however it seems useful to highlight the most common reasons for specifically conducting a PRA for plants as pests.	European Union
[84]	20	Editorial	ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. Particular attention is needed for plants that have proven to be pests elsewhere or ~~having~~ that have intrinsic traits such as strong competitive~~ion~~ or propagule dispersal abilities. In most cases, consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; however, in cases where the plant is clearly only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.	Better grammar	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[85]	20	Editorial	ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. However in cases where the plant is clearly only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point. Particular attention is needed for plants that have proven to be pests elsewhere or having intrinsic traits such as strong competition or	better flow	United States of America

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			propagule dispersal abilities. In most cases, consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; ~~however, in cases where the plant is clearly only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.~~		
[86]	20	Editorial	ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. Particular attention is needed for plants that have proven to be pests elsewhere or ~~having~~ that have intrinsic traits such as strong competitive~~ion~~ or propagule dispersal abilities. In most cases, consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; however, in cases where the plant is clearly only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.	Better grammar	European Union
[87]	20	Editorial	ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. Particular attention is needed for plants that have proven to be pests elsewhere or having intrinsic traits such as strong competition or propagule dispersal abilities. In most cases, consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; however, in cases where it is clearly determined that the plant is suitable only for a specific type of habitat ~~the plant is clearly only suited to a specific type of habitat~~ that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.	To clarify	El Salvador
[88]	20	Substantive	~~ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. Particular attention is needed for plants that have proven to be pests elsewhere or having intrinsic traits such as strong competition or propagule dispersal abilities. In most cases, consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; however, in cases where the plant is clearly only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.~~ ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. Particular attention is needed for plants that have proven to be pests elsewhere or having intrinsic traits such as strong competition or propagule dispersal abilities. In most cases,	Suggest to add the condition at which PRA of plants as pests are necessary to conduct.	China

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; however, in cases where the plant is clearly only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.		
[89]	20	Technical	ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. Particular attention is needed for plants that have proven to be pests elsewhere or having intrinsic traits such as strong competition or propagule dispersal abilities and high reporduction rate. In most cases, consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; however, in cases where the plant is ~~clearly~~ only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.	For accuracy	Thailand ,Lao People's Democratic Republic,Japan ,Viet Nam ,India
[90]	20	Technical	ISPM 2:2007 describes, as part of the initiation stage, a pre-selection step intended for determining whether or not an organism is a pest, and provides some indicators that a plant may be a pest. Particular attention is needed for plants that have proven to be pests elsewhere or having intrinsic traits such as strong competition or propagule dispersal abilities and high reporduction rate. In most cases, consideration of these factors in Stage 1 of PRA may not be sufficient to terminate the process; however, in cases where the plant is ~~clearly~~ only suited to a specific type of habitat that does not exist in the PRA area, it may be concluded that the plant cannot become a pest in that area and the PRA process may stop at that point.		Korea, Republic of
[91]	23	Editorial	The taxonomic level considered in PRA is usually the species. However~~, in the case of cultivated plants,~~ higher or lower taxonomic levels may be used where there is a scientifically sound rationale. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO.	The suggested amendment is to better reflect the text and intent in section 1.2 of ISPM 2. THe words deleted are inconsistent with paragraph 25 and ISPM 2. The deleted words imply that different taxonomic levels can only be used for cultivated plants, but paragraph 25 states that lower taxonomic levels can be used where the traits are stable and significantly affect phytosanitary status (possibly a redundancy, since traits that are unstable are probably not of phytosanitary significance). ISPM 2 highlights that different taxonomic levels should be	New Zealand

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				justified with a scientifically sound rationale.	
[92]	23	Editorial	The ~~taxonomic level~~ species is the taxonomic level usually considered in PRA ~~is usually the species~~. However, in the case of cultivated plants that may be pests, higher or lower taxonomic levels may be used. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO.	Better word order Emphasising the 'plants as pests' issue	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[93]	23	Editorial	The ~~taxonomic level~~ species is the taxonomic level usually considered in PRA ~~is usually the species~~. However, in the case of cultivated plants that may be pests, higher or lower taxonomic levels may be used. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO.	Better word order Emphasising the 'plants as pests' issue	European Union
[94]	23	Substantive	The taxonomic level considered in PRA is usually the species. However, in the case of ~~cultivated~~ plants for planting, higher or lower taxonomic levels may be used where appropriate and when supported by scientifically sound rationale. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO.	The assessment of plants at a higher or lower taxonomic level should not be restricted to those plants which have a history of cultivation. The assessment of any plant at a higher or lower taxonomic level should only be undertaken when scientifically justified. This would be consistent with Section 2.1.1.1 of ISPM 11.	Australia
[95]	23	Substantive	The taxonomic level considered in PRA for plants as pest is ~~usually~~ the species. However, ~~in the case of cultivated plants, higher or~~ lower taxonomic levels may be used. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO ~~.~~, if there is scientific justification or evidence to support the use of lower taxonomic level to species.	General guidelines are provide in session 2.1.1 of ISPM 11 and for plants as quarantine pest the species should be known to conduct the PRA. To strenghten paragraph 25.	Costa Rica ,Mexico ,Nicaragua ,El Salvador ,OIRSA,Brazil
[96]	23	Substantive	The taxonomic level considered in PRA for plants as pests is ~~usually~~ the species. However, ~~in the case of cultivated plants, higher or~~ lower taxonomic levels may be used. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO, if there is scientific justification or evidence to support the use of lower taxonomic levels to species.	1) General guidelines are provided in section 2.1.1 of ISPM 11 and for plants as quarantine pests, the species should be known to conduct the PRA. 2) Text added at the end of the paragraph to strength paragraph 25.	Uruguay
[97]	23	Substantive	The taxonomic level considered in PRA for plants as pests is ~~usually~~ the species. However, ~~in the case of cultivated plants, higher or~~ lower taxonomic levels may be used. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO, if there is scientific justification or evidence to support the use of lower taxonomic levels to species.	Added text "for plants as pests" and deleted "in the case of cultivated plants, higher or": General guidelines are provided in session 2.1.1. of ISPM 11 and for plants as quarantine pests the species should be known to conduct the PRA. Added text "if there is scientific justification or evidence to support the use of lower taxonomic levels	COSAVE,Paraguay ,Chile

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				to species": To strength para 25.	
[98]	23	Substantive	The taxonomic level considered in PRA for plants as pests is ~~usually~~ the species. However, ~~in the case of cultivated plants, higher or~~ lower taxonomic levels may be used. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO.if there is scientific justification or evidence to support the use of lower taxonomic levels to species	General guidelines are provided in session 2.1.1. of ISPM 11 and for plants as quarantine pests the species should be known to conduct the PRA To strength para 25	Argentina
[99]	23	Technical	The taxonomic level considered in PRA is usually the species. However, in the case of cultivated plants, higher or lower taxonomic levels may be used. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the National Plant Protection Organization (NPPO).	Develop acronym the first time it occurs in the text of the Standard also as per glossary definition.	Mexico
[100]	23	Technical	The taxonomic level considered in PRA is usually the species. As for other types of pests, ~~H~~however, ~~in the case of cultivated plants~~, higher or lower taxonomic levels may be used and may be appropriate, in particular for cultivated plants and should be supported by scientifically sound rationale. The taxonomic level appropriate for conducting the PRA for a particular plant as pest should be determined by the NPPO.	New text is added to avoid confusion and to be consistent with the provisions of ISPM 11 section 2.1.1.1	Canada
[101]	25	Editorial	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for horticultural plants ~~in the horticultural trade~~. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory ~~or grazing/browsing~~, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is ~~determined~~ considered to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.	1. To avoid the ambiguous word ‘trade’. 2. "herbivory" includes grazing/browsing - removal of redundancy 3. Better word	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[102]	25	Editorial	• The taxonomic identity of the plant may be unclear because it has	1. To avoid the ambiguous word ‘trade’. 2.	European Union

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			been obscured by breeding or hybridization. This is particularly relevant for horticultural plants ~~in the horticultural trade~~. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory ~~or grazing/browsing~~, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is ~~determined~~ considered to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.	"herbivory" includes grazing/browsing - removal of redundancy 3. Better word	
[103]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization or is the subject of plant breeders rights. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.	1st dot point - To highlight another instance where parentage of a plant may not be able to be determined.	Australia
[104]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various		Indonesia

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			sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing or environmental constrain, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.		
[105]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions. The following criteria can be considered in determining the taxonomic identity of the plant: a) morphological and genetic characteristics b) taxonomic affinities c) distribution d) ecology (habitat which includes among others, specific geographic location i.e. altitude, etc. associated vegetation, species diversity, local names, flowering times, uses, etc.) e) native flora (plants introduced centuries ago by people migrating from one region or continent to another, and become an integral part of the native,	These criteria is based on the reference: Vaughan DA. 1992. The wild relatives of rice: A genetic resources handbook. IRRI, Los Baños, Philippines	Philippines

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			or natural flora of the place to which they were introduced) and agricultural and garden flora (intentionally grown and cultivated).		
[106]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is scientific evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.	To be consistent with PRA definition.	Costa Rica ,Nicaragua ,El Salvador ,Brazil
[107]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that ~~taxon~~ hybrid where available. ~~In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions~~.	An hybrid can not be defined as a taxon. A NPPO should not use this information as the basis of regulatory decisions. Pest risk information of parent species may or may not have a direct relation with pest risk of the hybrids.	Uruguay
[108]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various	To be consistent with PRA definition.	COSAVE,Paraguay ,Chile

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is scientific evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.		
[109]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is scientific evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that ~~taxon~~ hybrid where available. ~~In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.~~	~~To be consistent with PRA definition.~~ An hybrid can not be defined as a taxon. A NPPO should not use this information as the basis of regulatory decisions. Pest risk information of parent species may or may not have a direct relation with pest risk of the hybrids	Argentina
[110]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal.	As new paragraph to clarify that it is better to look into the likelihood of reverting back to the mother forms and possibilities of naturalising and whether it is a crossbreed between weakened inbred lines etc.	South Africa

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions. • In some cases, the hybrid may be a pest whilst the parents are not e.g. Lolium and Festuca forms a new genus, xFestulolium which is invasive and behaves differently to their mother plants and the hybrid is defined in a new taxon		
[111]	25	Substantive	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is scientific evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.	To be consistent with PRA definition.	OIRSA
[112]	25	Technical	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that hybrid ~~taxon~~ where available. ~~In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If~~	An hybrid can not be defined as a taxon. A NPPO should not use this information as the basis of regulatory decisions. Pest risk information of parent species may or may not have a direct relation with pest risk of the hybrids.	Costa Rica ,Nicaragua ,Brazil

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			~~either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.~~		
[113]	25	Technical	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that ~~taxon~~ hybrid where available. In ~~the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.~~	An hybrid can not be defined as a taxon. A NPPO should not use this information as the basis of regulatory decisions. Pest risk information of parent species may or may not have a direct relation with pest risk of the hybrids.	COSAVE,Paraguay
[114]	25	Technical	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that ~~taxon~~ hibrid where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.	An NPPO should not use this information as the basis of a regulatory decision. An hibrid can not be defined as taxon. Pest risk information of parental species may or may not have a direct relation with pest risk of the hibrids.	Mexico
[115]	25	Technical	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various	An hybrid can not be defined as a taxon. A NPPO should not use this information as the basis of regulatory decisions. Pest risk information of parent species may or may not have a direct relation with pest risk of	Argentina ,Uruguay

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is scientific evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that ~~taxon~~ hybridwhere available. ~~In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.~~	the hybrids	
[116]	25	Translation	• The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization. This is particularly relevant for plants in the horticultural trade. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). • The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is evidence demonstrating that differences in traits are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivory or grazing/browsing, and methods of reproduction or propagule dispersal. • The evaluation of a hybrid should be based on information specific to that taxon where available. In the absence of such information, PRA may be conducted on the parent species to determine their pest risk. If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of regulatory decisions.	Translate to Spanish the second sentence of the last bullet as follows: "Si se determina que alguno de los padres es una plaga y el riesgo asociado se considera inaceptable, esta información podría establecer las bases de las decisiones normativas" Explanation: the appropriate translation for "parents" it is "padres"	El Salvador
[117]	27	Substantive	Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be ~~present~~ growing in locations (e.g. botanical gardens, home gardens) that ~~are~~ may not be reported. ~~in the scientific literature. Additional s~~Sources of information ~~to be consulted~~ may include horticultural, agricultural, forestry and aquaculture publications. An NPPO may categorize plants that are grown or kept under protected conditions only and that the NPPO has determined cannot survive outdoors in the PRA area (e.g. in vitro collections, and some indoor plants and seed collections) as absent. An NPPO may also categorize plants only planted in collections such as	Para 1. To avoid the judgement of plants being 'Present', which would contradict with the insertions below. In any PRA, scientific literature is not the only data source. Paras 2-3. It seems appropriate that the NPPO at the pest categorization step may deem plants that would not be able to survive and establish beyond artificial indoor conditions as absent. Similarly, the NPPO may deem plants that are only grown under safeguarded conditions as absent.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			botanical gardens as absent, provided that appropriate safeguards, approved by the NPPO, has been established and implemented to restrict any natural or human mediated spread from such collections.		
[118]	27	Substantive	Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be ~~present~~ growing in locations (e.g. botanical gardens, home gardens) that ~~are~~ may not be reported. ~~in the scientific literature. Additional s~~Sources of information ~~to be consulted~~ may include horticultural, agricultural, forestry and aquaculture publications. An NPPO may categorize plants that are grown or kept under protected conditions only and that the NPPO has determined cannot survive outdoors in the PRA area (e.g. in vitro collections, and some indoor plants and seed collections) as absent. An NPPO may also categorize plants only planted in collections such as botanical gardens as absent, provided that appropriate safeguards, approved by the NPPO, has been established and implemented to restrict any natural or human mediated spread from such collections.	Para 1. To avoid the judgement of plants being 'Present', which would contradict with the insertions below. In any PRA, scientific literature is not the only data source. Paras 2-3. It seems appropriate that the NPPO at the pest categorization step may deem plants that would not be able to survive and establish beyond artificial indoor conditions as absent. Similarly, the NPPO may deem plants that are only grown under safeguarded conditions as absent.	European Union
[119]	27	Substantive	(1) Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be present in locations (e.g. botanical gardens, home gardens) that are not reported in the scientific literature. Additional sources of information to be consulted may include horticultural, agricultural, forestry and aquaculture publications. (2) Presence of wild and cultivated relatives in the PRA area should also be determined. The imported plants could potentially hybridize with local relatives to become serious pests.	Para 13 of the Introduction mentions this phenomenon. However consideration and implication of this phenomenon is not elaborated further in the PRA. Perhaps more should be highlighted on the significance how invasives can outcross with local relatives and be fitter pests in the local environment or vice versa..	Singapore
[120]	27	Substantive	~~Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be present in locations (e.g. botanical gardens, home gardens) that are not reported in the scientific literature. Additional sources of information to be consulted may include horticultural, agricultural, forestry and aquaculture publications.~~ Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be present in locations (e.g. botanical gardens, home gardens) that are not reported in the scientific literature. Additional sources of information to be consulted may include horticultural, agricultural, forestry and aquaculture publications. At the same time, NPPO of importing country may carry out the survey to get the information of present distribustion in	add information.	China

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			order to facilitate the PRA.		
[121]	27	Substantive	~~Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be present in locations (e.g. botanical gardens, home gardens) that are not reported in the scientific literature. Additional sources of information to be consulted may include horticultural, agricultural, forestry and aquaculture publications.~~	This paragraph seems an unnecessary addition, as the challenge of determining the presence or absence of a species in a country applies equally to other types of pests and to all aspects of phytosanitary work, not just PRA. This type of guidance is not usually included in ISPMs, though ISPM No. 8 (section 2.2) discusses reliability of different sources of information, including those mentioned in the proposed text.	Canada
[122]	27	Technical	Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be present in locations (e.g. botanical gardens, home gardens) that are not reported in the scientific literature. Additional sources of information to be consulted may include horticultural, agricultural, forestry and aquaculture publications. Therefore wide range of technical information collection and expert's judgement are required to determine the presence in the PRA area especially for plants. At the same time, the NPPO of importing country may carry out surveillance programme.		Korea, Republic of
[123]	27	Technical	Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be present in locations (e.g. botanical gardens, home gardens) that are not reported in the scientific literature. Additional sources of information to be consulted may include horticultural, agricultural, forestry and aquaculture publications. Therefore wide range of technical information collection and expert's judgement are required to determine the presence in the PRA area especially for plants. At the same time, the NPPO of importing country may carry out surveillance programme.	Clarification	Thailand ,Lao People's Democratic Republic,Japan ,Viet Nam ,India
[124]	27	Technical	Determination of presence or absence in the PRA area is a particular challenge for NPPOs when plants are proposed for import because the plants may already be present in locations (e.g. botanical gardens, home gardens) that are not reported in the ~~scientific literature~~ national register. Additional sources of information to be consulted may include horticultural, agricultural, forestry ~~and~~, or aquaculture ~~publications~~ literature and information from scientific publications and databases.	Improve the text and include more specific sources to find information and to be in agrrement with ISPM 8.	Mexico
[125]	29	Editorial	The PRA should ~~be conducted~~ include the consideration~~ing~~ of the intended	More accurate explanation	EPPO,Russian Federation

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			use of the plants as this may affect the probability of establishment, spread and economic consequences. However, it should also be recognized that plants, once entered, may escape or be diverted from the use for which they were originally intended.		,Ukraine ,Morocco ,Uzbekistan
[126]	29	Editorial	The PRA should be conducted considering the intended use of the plants as this may affect the probability of establishment, spread and economic consequences. However, it should also be recognized that plants, once entered, may escape or be diverted from the use for which they were originally intended.	In the spanish version, change the current sentence: El ARP debería realizarse teniendo en cuenta el uso "proviso".... by the following: El ARP debería realizarse teniendo en cuenta el uso "previsto"....	Mexico
[127]	29	Editorial	The PRA should ~~be conducted~~ include the consider ation ~~ing~~ of the intended use of the plants as this may affect the probability of establishment, spread and economic consequences. However, it should also be recognized that plants, once entered, may escape or be diverted from the use for which they were originally intended.	More accurate explanation	European Union
[128]	29	Technical	The PRA should be conducted considering the intended use of the plants as this may affect the probability of establishment, spread and economic consequences (ISPM 32). However, it should also be recognized that plants, once entered, may escape or be diverted from the use for which they were originally intended.	ISPM 32 should be referenced here.	United States of America
[129]	29	Technical	The PRA should be conducted considering the intended use of the plants as this may affect the probability of establishment, spread and economic consequences. However, it should also be recognized that plants, once entered, may escape or be diverted from the use for which they were originally intended.	In the Spanish version of the draft, this paragraph refer this: El ARP debería realizarse teniendo en cuenta el uso proviso de las plantas puesto que ello podrá afectar la probabilidad de establecimiento, dispersión y las consecuencias económicas. Sin embargo, también debería reconocerse que las plantas, una vez que entren, podrán escapar o desviarse del uso originalmente previsto. Mexico suggest this: El ARP debería realizarse teniendo en cuenta el uso previsto de las plantas puesto que ello podrá afectar la probabilidad de establecimiento, dispersión y las consecuencias económicas. Sin embargo, también debería reconocerse que las plantas, una vez que entren, podrán escapar o desviarse del uso originalmente previsto. The change is in the word proviso for previsto	Mexico

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[130]	29	Technical	The PRA should be conducted considering the intended use of the plants, **including the intended locations and methods of distribution, cultivation or propagation (if applicable)**, as this may affect the probability of **entry, establishment**, spread and economic consequences **in unintended locations**.	The proposed re-wording in bold in sentence 1 clarifies the meaning and provides additional considerations when conducting the PRA.	Canada
[131]	30	Technical	Plants for planting are generally considered ~~of~~ to pose the highest risk. Examples of uses, broadly in the order of decreasing risk at the time of planting, are:	The risk ranking is relevant at time of planting but may later change	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[132]	30	Technical	Plants for planting are generally considered ~~of~~ to pose the highest risk. Examples of uses, broadly in the order of decreasing risk at the time of planting, are:	The risk ranking is relevant at time of planting but may later change	European Union
[133]	30	Translation	Plants for planting are generally considered of the highest risk. Examples of uses, broadly in the order of decreasing risk, are:	Translate the paragraph into Spanish as follow: "Por lo general se considera que las plantas para plantar representan el mayor riesgo. En líneas generales los ejemplos de usos, en orden de riesgo decreciente, son:" For better understanding.	El Salvador
[134]	30	Translation	Plants for planting are generally considered of the highest risk. Examples of uses, broadly in the order of decreasing risk, are:	Translate the paragraph into Spanish as follow: "Por lo general se considera que las plantas para plantar representan el mayor riesgo. En líneas generales los ejemplos de usos, en orden de riesgo decreciente, son:" For better understanding.	OIRSA
[135]	31	Editorial	• planting in the open landscape without further management (e.g. for soil erosion control, waste water treatment and~~,~~ aquatic plants in ponds) • planting in the open landscape with management (e.g. in forestry, botanical garden, golf course, land reclamations, cover crops, agriculture including for biofuel and~~,~~ horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only.		Korea, Republic of ,Lao People's Democratic Republic,Japan ,Viet Nam ,India
[136]	31	Editorial	• planting in the open landscape without ~~further~~ management (e.g. for soil erosion control, waste water treatment, aquatic plants in ponds) • planting in the open landscape with management (e.g. in forestry, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in		El Salvador

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			roadsides, parks and gardens) • planting indoors only.		
[137]	31	Editorial	• planting in the open landscape without ~~further~~ management (e.g. for soil erosion control, waste water treatment, aquatic plants in ponds) • planting in the open landscape with management (e.g. in forestry, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only.	For better understanding.	OIRSA
[138]	31	Substantive	• planting in the open landscape without further management (e.g. for soil erosion control, waste water treatment, aquatic plants in ponds) • planting in the open landscape with management (e.g. in forestry, botanical garden, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only.		Indonesia
[139]	31	Technical	• planting in the open landscape without further management (e.g. for soil erosion control, waste water treatment, carbon dioxide uptake, aquatic plants in watercourses or ponds) • planting in the open landscape with management (e.g. in forestry, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only.	Large scale planting for reduction of CO2 emission is a relevant activity to mention. Planting in watercourses may carry high risk.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[140]	31	Technical	• planting in the open landscape without further management (e.g. for soil erosion control, waste water treatment, aquatic plants in ponds) • planting in the open landscape with management (e.g. in forestry, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only. • for rearch purposes	New indent is needed to include other risk identify under the actual situation	Mexico

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[141]	31	Technical	• planting in the open landscape without further management (e.g. for soil erosion control, waste water treatment, carbon dioxide uptake, aquatic plants in watercourses or ponds) • planting in the open landscape with management (e.g. in forestry, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only.	Large scale planting for reduction of CO2 emission is a relevant activity to mention. Planting in watercourses may carry high risk.	European Union
[142]	31	Translation	• planting in the open landscape without further management (e.g. for soil erosion control, waste water treatment, aquatic plants in ponds) • planting in the open landscape with management (e.g. in forestry, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only.	Translate to Spnish "open landscape" like "campo abierto" More appropiate term in Spanish.	El Salvador
[143]	31	Translation	• planting in the open landscape without further management (e.g. for soil erosion control, waste water treatment, aquatic plants in ponds) • planting in the open landscape with management (e.g. in forestry, agriculture including for biofuel, horticulture) • planting outdoors in urban areas (e.g. for amenity purposes in roadsides, parks and gardens) • planting indoors only.	Translate to Spnish "open landscape" like "campo abierto" More appropiate term in Spanish.	OIRSA
[144]	32	Editorial	Other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, ~~spillage of~~ grain intended for processing, if spilled, may lead to unintended growth of plants as pests.	Improvement of text.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[145]	32	Editorial	Plants for ~~O~~other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	To be consistent with paragraph 30.	Costa Rica ,Nicaragua ,Brazil
[146]	32	Editorial	Plants for ~~O~~other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	To be consistent with paragraph 30	Uruguay

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[147]	32	Editorial	Plants for ~~O~~other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	To be consistent to para 30	COSAVE,Paraguay ,Chile
[148]	32	Editorial	Other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, ~~spillage of~~ grain intended for processing, if spilled, may lead to unintended growth of plants as pests.	Improvement of text.	European Union
[149]	32	Editorial	Plants for o~~O~~ther intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	To be consistent to para 30	Argentina
[150]	32	Editorial	Plant for ~~O~~other intended uses may be considered, including human or animal consumption ~~or animal feed~~, processing or combustion for energy production. For example, spillage of grain whose intended use is ~~for~~ processing may lead to unintended propagation ~~growth~~ of plants as pests.	1) To be consistent with paragraph 30; 2), 3), 4) and 5) For better understanding.	El Salvador
[151]	32	Editorial	Plants for ~~O~~other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain whose intended use is ~~for~~ processing, may lead to unintended propagation ~~growth~~ of plants as pests.	1) To be consistent with paragraph 30; 2), 3), 4) For better understanding.	OIRSA
[152]	32	Substantive	Other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. ~~For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.~~	Confusing example. The way the statement is worded, NPPOs may decide to regulate grain as if it is meant for propagation when it is meant for processing. Also, this statement is a bad example and contradictory as it discusses “intended uses” of which spillage is not an intended use.	United States of America
[153]	32	Substantive	Other intended uses other than for planting, may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	To be more explicit about what is meant by the other uses. Although plants for planting are high risk, seeds for processing and animal feed can come in large quantities. Dispersal as a result of spillage or feeding of animals can hardly be contained. Nonetheless they cannot be ignored because of the benefit they bring.	Singapore
[154]	32	Substantive	Other intended uses ~~may~~should be considered, including human consumption or animal feed, processing or combustion for energy	Consideration for PRA on other intended uses should not be an option. Also refer to	South Africa

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	paragraph 34.	
[155]	32	Technical	Other intended uses may be considered, including human or animal consumption ~~or animal feed~~, research, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	Include other risk because is something that is ocurring today	Mexico
[156]	32	Technical	Other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production but only when there is a potential for propagation. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	Other intended uses should only be considered when the product could be propagated.	Canada
[157]	32	Technical	Other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests. The importance of considering the intended use of an imported product was discussed. The changing of use from consumption to plating for some import s was mentioned and the dangers noted. It can be very difficult to control the use of imported plant material once it is i a country		Solomon Islands
[158]	32	Technical	Other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production and research. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests.	Research could be an another important intended use.	OIRSA
[159]	32	Translation	Other intended uses may be considered, including human consumption or animal feed, processing or combustion for energy production. For example, spillage of grain intended for processing may lead to unintended growth of plants as pests~~.~~	Translate to Spanish "including human consumption or animal feed" like "incluyendo el consumo humano o animal" Explanation: for better understanding.	OIRSA
[160]	33	Substantive	~~Habitats and i~~*Intended habitats* ~~locations~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Costa Rica ,Mexico ,Nicaragua ,El Salvador
[161]	33	Substantive	~~Habitats and i~~*Intended* ~~locations~~ *habitats*	PRA is conducted for a defined area (PRA area) and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this	Uruguay

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				paragraph.	
[162]	33	Substantive	~~*Habitats and i*~~*Intended habitats* ~~*locations*~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	COSAVE,Paraguay ,Chile,Brazil
[163]	33	Substantive	~~*Habitats and intended locations*~~ *Habitats and intended areas*	Global change in this section: use "area" instead of "location". It is understantable why the Expert Working Group wanted to avoid the use of the word habitat as any given habitat may include intended and unintended locations. However, the use of the word location is too specific because it implies very narrow areas (e.g., points) that may be too specific for an NPPO to effectively manage. Thus we suggest using the term area instead of location.	United States of America
[164]	33	Substantive	~~*Habitats and i*~~ *Intended habitats* ~~*locations*~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph	Argentina
[165]	33	Substantive	~~*Habitats and i*~~*Intended habitats* ~~*locations*~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph However, the term "locations" may be useful only for "other" specific places, not relating to ecosystems neither agro-ecosystems (without ecologycal sense)	OIRSA
[166]	34	Editorial	Plants imported for planting may be destined for a particular planting location (which may be termed as the “intended location”). However, the probability that the plants may spread to and establish in ~~other~~ unintended locations ~~in the PRA area of the same or another habitat type~~ should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats be determined in order to identify the endangered area.	Clearer wording, deleting unnecessary words.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[167]	34	Editorial	Plants imported for planting may be destined for a particular planting location (which may be termed as the “intended location”). However, the probability that the plants may spread to and establish in ~~other~~ unintended locations in the PRA area ~~of the same or another habitat type~~ should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats be determined in order to identify the endangered area.	Clearer wording, deleting unnecessary words.	European Union
[168]	34	Substantive	Plants ~~imported~~ for planting may be destined for a particular habitat in the PRA area (intented habitat) ~~planting location (which may be termed as the “intended location”)~~. However, the probability that the plants may spread to and establish in other unintended habitats ~~locations~~ in the PRA area ~~of the same or another habitat type~~ should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats be determined in order to identify the endangered area.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Costa Rica ,Nicaragua ,El Salvador ,OIRSA
[169]	34	Substantive	Plants ~~imported~~ for planting may be destined for a particular habitat in the PRA area (intended habitat) ~~planting location (which may be termed as the “intended location”)~~. However, the probability that the plants may spread to and establish in other unintended ~~locations~~ habitats in the PRA area ~~of the same or another habitat type~~ should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats be determined in order to identify the endangered area.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	Uruguay
[170]	34	Substantive	Plants ~~imported~~ for planting may be destined for a particular habitat in the PRA area (intended habitat) ~~planting location (which may be termed as the “intended location”)~~. However, the probability that the plants may spread to and establish in other unintended habitats ~~locations~~ in the PRA area ~~of the same or another habitat type~~ should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats be determined in order to identify the endangered area.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	COSAVE,Paraguay ,Chile,Brazil
[171]	34	Substantive	Plants imported for planting may be destined for a particular planting area ~~location (which may be termed as the “intended location”)~~. However, the probability that the plants may spread to and establish in the PRA area within the same or another habitat type should be assessed. ~~other unintended locations in the PRA area of the same or another habitat type should be assessed.~~ The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats should be determined in order to identify the endangered area.	Remove references to “intended” and “unintended” Justification: It does not matter whether the location is “intended” or “unintended” it only matters that the plants can/will spread. Remove “(which may be termed as the ‘intended location’)” Justification: This information is unnecessary. If a plant is “destined for a particular planting location” it is already	United States of America

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				assumed that the plant is intended to be in that location. Change “spread to and establish in other unintended locations in the PRA area of the same or another habitat type should be accessed” to “spread and establish in the PRA area within the same or another habitat type should be assessed” Justification: Rewording makes statement clearer. Also, NPPOs would only be concerned with the PRA area which may or may not include unintended locations. Remove “other” in “other unintended locations” Justification: “Other” is unnecessary as no unintended locations have been referenced before for this statement. Add “should” in …extent of suitable habitats should be determined...” Justification: Grammatical o A habitat can be either intended or unintended.	
[172]	34	Substantive	Plants i~~mported~~ for planting may be destined for a particular planting location (which may be termed as the “intended location”). However, the probability that the plants may spread to and establish in other unintended locations in the PRA area of the same or another habitat type should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats be determined in order to identify the endangered area~~.~~	PRA is conducted for a difined area and not for different geographical locations with in the PRA area	Mexico
[173]	34	Substantive	Plants ~~imported~~ for planting may be destined for a particular habitat in the PRA area (intended habitat ~~planting location (which may be termed as the “intended location”).~~ However, the probability that the plants may spread to and establish in other unintended habitats ~~locations~~ in the PRA area ~~of the same or another habitat type~~ should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats be determined in order to identify the endangered area.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph	Argentina
[174]	34	Technical	Plants imported for planting may be destined for a particular planting location (which may be termed as the “intended location”). However, the probability that the plants may spread to and establish in other unintended locations in the PRA area of the same or another habitat type should be assessed. The ~~assessment should consider the~~ suitability of all habitat types in the entire PRA area~~,~~ and the extent of suitable habitats should be ~~determined~~ considered in order to identify the endangered area.	‘Determining’ the extent seems a too rigorous requirement.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[175]	34	Technical	Plants imported for planting may be destined for a particular planting location (which may be termed as the “intended location”). However, the probability that the plants may spread to and establish in other unintended locations in the PRA area of the same or another habitat type should be assessed. The ~~assessment should consider the~~ suitability of all habitat types in the entire PRA area~~,~~ and the extent of suitable habitats should be ~~determined~~ considered in order to identify the endangered area.	‘Determining’ the extent seems a too rigorous requirement.	European Union
[176]	34	Technical	Plants imported for planting may be destined for a particular planting location (which may be termed as the “intended location”). However, the probability that the plants may spread to and establish in other unintended locations in the PRA area of the same or another habitat type should be assessed. The assessment should consider the suitability of all habitat types in the entire PRA area, and the extent of suitable habitats should be determined in order to identify the endangered area. In cases where post-import controls can not be reasonably considered effective in limiting or preventing post-import distribution(e.g. horticultural plants) it may be appropriate to consider the entire PRA area and ignore the intended location.	The word "should" has been included to be gramatically correct. A sentence has been added after the last sentence of para. 34 to provide guidance in circumstances where post-import controls are innefective. It is also more appropriate to consider the PRA area than the intended location.	Canada
[177]	35	Editorial	The analysis of suitable habitats is analogous to the analysis of host plants for other pests (in the ~~rare~~ case of parasitic~~e~~ plants, both host and habitat need to be considered). The guidance provided in section 2.2.2 (and its subsections) of this standard can generally be used, substituting the term “host” or “host range” for “suitable habitat”.	Addition needed for clarity. Many cases are rare not just parasitic plants	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[178]	35	Editorial	The analysis of suitable habitats is analogous to the analysis of host plants (in the rare case of parasit~~e~~ic plants, both host and habitat need to be considered). The guidance provided in section 2.2.2 (and its subsections) of this standard can generally be used, substituting the term “host” or “host range” for “suitable habitat”.		Korea, Republic of ,Philippines ,Lao People's Democratic Republic,Japan ,Viet Nam ,India
[179]	35	Editorial	The analysis of suitable habitats is analogous to the analysis of host plants for other pests (in the ~~rare~~ case of parasitic~~e~~ plants, both host and habitat need to be considered). The guidance provided in section 2.2.2 (and its subsections) of this standard can generally be used, substituting the term “host” or “host range” for “suitable habitat”.	Addition needed for clarity. Many cases are rare, not just parasitic plants.	European Union
[180]	35	Editorial	~~The analysis of suitable habitats is analogous to the analysis of host plants (in the rare case of parasite plants, both host and habitat need to be considered). The guidance provided in section 2.2.2 (and its subsections) of this standard can generally be used, substituting the term “host” or “host range” for “suitable habitat”.~~ The analysis of suitable habitats is analogous to the analysis of host plants		China

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			(in the rare case of parasiticte plants, both host and habitat need to be considered). The guidance provided in section 2.2.2 (and its subsections) of this standard can generally be used, substituting the term “host” or “host range” for “suitable habitat”.		
[181]	35	Editorial	The analysis of suitable habitats is analogous to the analysis of host plants (in the ~~rare~~ case of parasite plants, both host and habitat need to be considered). The guidance provided in section 2.2.2 (and its subsections) of this standard can generally be used, substituting the term “host” or “host range” for “suitable habitat”.	To simplify	El Salvador
[182]	35	Editorial	The analysis of suitable habitats is analogous to the analysis of host plants (in the ~~rare~~ case of parasite plants, both host and habitat need to be considered). The guidance provided in section 2.2.2 (and its subsections) of this standard can generally be used, substituting the term “host” or “host range” for “suitable habitat”.	To simplify.	OIRSA
[183]	36	Substantive	~~If the plant already occurs in parts of the PRA area, the locations and types of habitats where it occurs should be described, noting whether the locations are intended or unintended.~~	As mentioned in paragraph 34 the assessment should consider the suitability of all habitats in the PRA area. To make the distinction for plants occurring in parts of the PRA area is confusing and redudant.	Costa Rica ,Nicaragua ,El Salvador
[184]	36	Substantive	~~If the plant already occurs in parts of the PRA area, the locations and types of habitats where it occurs should be described, noting whether the locations are intended or unintended.~~	As mentioned in paragraph 34 the assessment should consider the suitability of all habitats in the PRA area. To make the distinction for plants occurring in parts of the PRA area is confusing and redundant	Uruguay
[185]	36	Substantive	~~If the plant already occurs in parts of the PRA area, the locations and types of habitats where it occurs should be described, noting whether the locations are intended or unintended.~~	As mentioned in paragraph 34 the assessment should considered the suitability of all habitats in PRA area. To make the distinction for plants occurring in parts of the PRA area is confusing and redundant with paragraph 34.	COSAVE,Paraguay ,Chile,Brazil
[186]	36	Substantive	~~If the plant already occurs in parts of the PRA area, the locations and types of habitats where it occurs should be described, noting whether the locations are intended or unintended.~~	As mentioned in paragraph 34 the assessment should considered the suitability of all habitats in PRA area. To make the distinction for plants occurring in parts of the PRA area is confusing and redundant with paragraph 34.	Argentina
[187]	36	Substantive	If the plant already occurs in parts of the PRA area, the locations and types of habitats where it occurs should be described, noting whether the locations	It is suggested that this paragraph be moved up to follow paragraph 26 under the	Canada

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			are intended or unintended.	heading of presence or absence.	
[188]	36	Substantive	~~If the plant already occurs in parts of the PRA area, the locations and types of habitats where it occurs should be described, noting whether the locations are intended or unintended.~~	As mentioned in paragraph 34 the assessment should consider the suitability of all habitats in the PRA area. To make the distinction for plants occurring in parts of the PRA area is confusing and redundant.	OIRSA
[189]	38	Editorial	For intentionally imported plants, the probability of entry need not be assessed since entry is assured. Nonetheless, information on volume, frequency and destination(s) of prospective imported plants may be needed in order to estimate the likelihood of establishment and spread, and to identify possible risk management options~~For imported plants, the probability of entry need not be assessed. However, to assess the likelihood of unintended establishment and spread and to identify possible risk management options, an estimation of the volume, frequency and destinations of prospective imports may be needed.~~	Delete the current sentence and replace by new text to improve clarity.	Canada
[190]	40	Editorial	The most reliable predictor of establishment, spread and potential economic consequence is the history of plants as pests ~~behaviour~~ in other areas with similar habitats. Where such a history ~~of pest behaviour~~ is documented the assessment should use this information, noting whether the habitat and climate conditions are sufficiently similar in the PRA area. However, a plant may never have been moved out of its native range where it may be controlled by naturally occurring pests. In such cases, no historical evidence exists of establishment, spread or consequences.	Simpler wording.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[191]	40	Editorial	The most reliable predictor of establishment, spread and potential economic consequence is the history of plants as pests ~~behaviour~~ in other areas with similar habitats. Where such a history ~~of pest behaviour~~ is documented the assessment should use this information, noting whether the habitat and climate conditions are sufficiently similar in the PRA area. However, a plant may never have been moved out of its native range where it may be controlled by naturally occurring pests. In such cases, no historical evidence exists of establishment, spread or consequences.	Simpler wording.	European Union
[192]	40	Editorial	The most reliable predictor of establishment, spread and potential economic consequence is the history of pest behaviour in other areas with similar habitats. Where a history of pest behaviour is documented, the assessment should use this information, noting whether the habitat and climate conditions are sufficiently similar in the PRA area. However, a plant may never have been moved out of its native range where it may be controlled by naturally occurring pests. In such cases, no historical evidence exists of establishment, spread or consequences.	Addition of comma for sentence to flow more appropriately.	South Africa

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[193]	40	Substantive	The most reliable predictor of establishment, spread and potential economic consequence is the history of pest behaviour in other areas with similar habitats. Where a history of pest behaviour is documented the assessment should use this information, noting whether the habitat and climate conditions are sufficiently similar in the PRA area. However, a plant may never have been moved out of its native range where it may be controlled by naturally occurring pests. In such cases, no historical evidence exists of establishment, spread or consequences, and the analysis may need to focus on factors affecting plant establishment..	more correct	United States of America
[194]	40	Substantive	The most reliable predictor of establishment, spread and potential economic consequence is the history of pest behaviour in other areas with similar habitats. Where a history of pest behaviour is documented the assessment should use this information, ~~noting whether the~~ comparing habitat ~~and climate conditions are sufficiently similar in~~ with those present in the PRA area. However, a plant as pest may never have been moved out of its native range where it may be controlled by naturally occurring ~~pests~~ enemies. In such cases, no historical evidence exists of establishment, spread or consequences.	1.- If the plant as pest has been regulated by natural enemies, these natural enemies must not be considered as pest. 2.- A comparison of several environmental features can give better idea of the potential of establishment, when they already have been outside the target area .	Mexico
[195]	40	Technical	The most reliable predictor of establishment, spread and potential economic consequence is the history of pest behaviour in other areas with similar habitats and climate. Where a history of pest behaviour is documented the assessment should use this information, noting whether the habitat and climate conditions are sufficiently similar in the PRA area. However, a plant may never have been moved out of its native range where it may be controlled by naturally occurring pests or other biotic or abiotic factors. In such cases, no historical evidence exists of establishment, spread or consequences.	Climate is also an important factor when considering pest behaviour (see sentence 2). Last sentence: In its native range, a plant may be controlled not only by pests, but also by other factors. Other factors may also explain why the plant had not been a pest in its native range	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[196]	40	Technical	The most reliable predictor of establishment, spread and potential economic consequence is the history of pest behaviour in other areas with similar habitats and climate. Where a history of pest behaviour is documented the assessment should use this information, noting whether the habitat and climate conditions are sufficiently similar in the PRA area. However, a plant may never have been moved out of its native range where it may be controlled by naturally occurring pests or other biotic or abiotic factors. In such cases, no historical evidence exists of establishment, spread or consequences.	Climate is also an important factor when considering pest behaviour (see sentence 2). Last sentence: In its native range, a plant may be controlled not only by pests, but also by other factors. Other factors may also explain why the plant had not been a pest in its native range	European Union
[197]	40	Technical	The most reliable predictor of establishment, spread and potential economic consequence is the history of pest behaviour when introduced into new ~~in other~~ areas with similar habitats.	Deletion and addition of new text provides clarity with regards to evidence of pest behaviour.	Canada

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			In the absence of such information the next best reliable indicator is the ~~Where a~~ history of pest behaviour in other areas with similar habitats ~~is documented the assessment should use this information, noting whether the habitat and climate conditions are sufficiently similar in the PRA area.~~ However, a plant may never have been moved out of its native range where it may be controlled by naturally occurring pests. In such cases, no historical evidence exists of establishment, spread or consequences.		
[198]	42	Editorial	In all cases, the assessment of the probability of establishment, should, as for other pests, consider the suitability of the climate, other abiotic and biotic factors (see section 2.2.2.2) and cultural practices (see section 2.2.2.3) in habitats within the PRA area based on habitats in which the plant currently occurs. ~~Subject to~~ Depending on the information availableility, the following may be incorporated:	Clearer wording	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[199]	42	Editorial	~~In all cases,~~ tThe assessment of the probability of establishment, should~~, as for other pests,~~ consider the suitability of the climate, other abiotic and biotic factors (see section 2.2.2.2) and cultural practices (see section 2.2.2.3). The assessment relates the conditions within the PRA area to the conditions in habitats in which the plant already occurs. ~~in habitats within the PRA area based on habitats in which the plant currently occurs~~. Subject to information availability, the following may be incorporated:	Clearer	United States of America
[200]	42	Editorial	In all cases, the assessment of the probability of establishment, should, as for other pests, consider the suitability of the climate, other abiotic and biotic factors (see section 2.2.2.2) and cultural practices (see section 2.2.2.3) in habitats within the PRA area based on habitats in which the plant currently occurs. ~~Subject to~~ Depending on the information availableility, the following may be incorporated:	Clearer wording	European Union
[201]	42	Editorial	Assessment of probability of establishment should, as for other pests (see section 2.2.2), consider the suitability of the climate, other abiotic and biotic factors and cultural practices in habitats within the PRA in comparison to those in areas where the plant currently occurs. The following factors may be considered:~~In all cases, the assessment of the probability of establishment, should, as for other pests, consider the suitability of the climate, other abiotic and biotic factors (see section 2.2.2.2) and cultural practices (see section 2.2.2.3) in habitats within the PRA area based on habitats in which the plant currently occurs. Subject to information availability, the following may be incorporated:~~	Initlal text is long and difficult to follow. Suggested re-wording to improve clarity.	Canada
[202]	43	Substantive	• ~~*climate:* suitability of current and future projected climates~~ • ~~*other* *abiotic factors:* climate,~~ soil characteristics, topography, hydrology, fire regime etc.	Incorporate climate as an abiotic factor. Although it may be appropriate to consider climate change, in reality, PRAs are not	United States of America

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• *biotic factors:* current vegetation, degree of disturbance, presence or absence of natural enemies and competitors • *cultural practices in crops/managed plant communities:* herbicide usage, harvesting, soil cultivation, fire etc., including side-effects such as aerial deposition of nitrogen or pesticides.	intended to look indefinitely into the future.	
[203]	43	Technical	• *climate:* suitability of current and future projected climates • *other abiotic factors:* soil characteristics, topography, hydrology, natural fires ~~regime~~ etc. • *biotic factors:* current vegetation, degree of disturbance, presence or absence of natural enemies and competitors • *cultural practices in crops~~/~~ or managed plant communities:* herbicide usage, harvesting, soil cultivation, ~~fire~~ burning etc., including side-effects such as aerial deposition of nitrogen or pesticides.	Discriminating between natural and human mediated fires.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[204]	43	Technical	• *climate:* suitability of current and future projected climates • *other abiotic factors:* soil characteristics, topography, hydrology, natural fires ~~regime~~ etc. • *biotic factors:* current vegetation, degree of disturbance, presence or absence of natural enemies and competitors • *cultural practices in crops~~/~~ or managed plant communities:* herbicide usage, harvesting, soil cultivation, ~~fire~~ burning etc., including side-effects such as aerial deposition of nitrogen or pesticides.	Discriminating between natural and human mediated fires.	European Union
[205]	44	Editorial	The assessment should also consider intrinsic traits of the plant that may predict establishment ~~and spread~~ (refer to section 2.2.2.4). This is particularly important where history of the plants as a pest ~~behaviour~~ is not well documented. Traits to be considered may include:	'Spread' is out of place in this section Better wording.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[206]	44	Editorial	The assessment should also consider intrinsic traits of the plant that may predict establishment ~~and spread~~ (refer to section 2.2.2.4). This is particularly important where history of the plants as a pest ~~behaviour~~ is not well documented. Traits to be considered may include:	'Spread' is out of place in this section Better wording.	European Union
[207]	44	Editorial	The assessment should also consider intrinsic traits of the plant that may be predictive of establishment and spread (refer to section 2.2.2.4). This is particularly important where history of pest behaviour is not well documented. Traits to be considered may include:	Suggested re-wording to add clarity to the text.	Canada
[208]	44	Editorial	The assessment should also consider intrinsic characteristics ~~traits~~ of the plant that may predict establishment and spread (refer to section 2.2.2.4).	To be consistent with the wording used in the ISPM No. 11	El Salvador

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			This is particularly important where history of pest behaviour is not well documented. Characteristis ~~Traits~~ to be considered may include:		
[209]	44	Editorial	The assessment should also consider intrinsic characteristics ~~traits~~ of the plant that may predict establishment and spread (refer to section 2.2.2.4). This is particularly important where history of pest behaviour is not well documented. Characteristics ~~Traits~~ to be considered may include:	To be consistent with the wording used in the ISPM No. 11	OIRSA
[210]	44	Substantive	In the case of plants for planting, significant effort is made to ensure the ongoing survival of the imported plant material. This acts to significantly increase the likelihood that the plant will establish within habitats in the PRA area. The assessment should also consider intrinsic traits of the plant that may predict establishment and spread (refer to section 2.2.2.4). This is particularly important where history of pest behaviour is not well documented. Traits to be considered may include:	Insert new para. Plant imported for planting are significantly different to other intended uses and as such, have a higher chance of becoming established within the PRA area.	Australia
[211]	44	Substantive	Where history of pest behaviour is not well documented, ~~T~~the assessment ~~should~~may also consider intrinsic traits of the plant that may predict establishment and spread (refer to section 2.2.2.4). ~~This is particularly important where history of pest behaviour is not well documented.~~ Traits to be considered may include:	The order of the sentences was revised for better conceptual clarity. In the absence of data on past behaviour, you may want to look at plant's traits to see if it has traits similar to other bad weeds. Furthermore the word "should" is too prescriptive; changing it to "may" will be better.	United States of America
[212]	44	Technical	The assessment should also consider intrinsic traits of the plant that may predict establishment and spread (refer to section 2.2.2.4). This is particularly important where history of pest behaviour is not well documented. Although intrinsic ~~T~~traits have often been shown to be poor predictors, the following may ~~to~~ be considered ~~may include~~:	To provide guidance on the uncertainty of using intrinsic properties as predictors.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[213]	44	Technical	The assessment should also consider intrinsic traits of the plant that may predict establishment and spread (refer to section 2.2.2.4). This is particularly important where history of pest behaviour is not well documented. Although intrinsic ~~T~~traits have often been shown to be poor predictors, the following may ~~to~~ be considered ~~may include~~:	To provide guidance on the uncertainty of using intrinsic properties as predictors.	European Union
[214]	45	Editorial	• *reproductive traits:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential		Thailand

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• *propagule attributes:* volume and viability, dormancy • *tolerance/resistance/susceptibility:* response to herbicides, grazing and other actual cultural practices, stress conditions such as drought, flooding and salinity.		
[215]	45	Editorial	• *reproductive traits:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/resistance/susceptibility:* response to herbicides, grazing and other actual cultural practices, drought, salinity.		Korea, Republic of ,Philippines ,Lao People's Democratic Republic,Japan ,Viet Nam ,India
[216]	45	Editorial	• *reproductive characteristics ~~traits~~:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/resistance:* response to herbicides, grazing and other actual cultural practices, drought, salinity.	To be consistent with the proposed heading	OIRSA
[217]	45	Substantive	• *reproductive traits:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/resistance/susceptible:* response to herbicides, grazing and other actual cultural practices, drought, salinity.		Indonesia
[218]	45	Substantive	• *reproductive traits:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/resistance:* to specific disease, response to herbicides, grazing and other actual cultural practices, drought, salinity.	Should be important to include the tolerance or resistance to a specific plant disease	Mexico
[219]	45	Technical	• *reproductive traits:* sexual and asexual mechanisms, dioecism,	Valid additional examples for extra	EPPO,Norway ,Russian

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			duration of flowering, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/ or resistance:* response to herbicides, grazing and other actual cultural practices, drought, frost, salinity.	guidance	Federation ,Ukraine ,Morocco ,Uzbekistan
[220]	45	Technical	• *reproductive traits:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/resistance:* response to herbicides, pests, grazing and other actual cultural practices, drought, salinity.	It is another relevant trait to be considered.	Costa Rica ,Nicaragua ,El Salvador
[221]	45	Technical	• *reproductive traits:* sexual and asexual mechanisms, dioecism, duration of flowering, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/ or resistance:* response to herbicides, grazing and other actual cultural practices, drought, frost, salinity.	Valid additional examples for extra guidance	European Union
[222]	45	Technical	• *reproductive traits:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time • *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • the adaptive potential could include the ability to withstand climate change • *propagule attributes:* volume and viability, dormancy • *tolerance/resistance:* response to herbicides, grazing and other actual cultural practices, drought, salinity.		Solomon Islands
[223]	45	Technical	• *reproductive traits:* sexual and asexual mechanisms, dioecism, self-compatibility, reproduction frequency, generation time	It is another relevant characteristic to be considered	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• *adaptive potential (of individuals and populations):* genotypic or phenotypic plasticity, hybridization potential • *propagule attributes:* volume and viability, dormancy • *tolerance/resistance:* response to herbicides, pests, grazing and other actual cultural practices, drought, salinity.		
[224]	46	Editorial	Many plants as pests are opportunists with a strong potential to become established in disturbed habitats. Plants with a robust dormancy combined with a prolific reproductive ability are particularly suited for such an opportunistic strategy. Disturbed habitats are common; therefore plants with such adaptations ~~will~~ may encounter ~~relatively more~~ many opportunities for establishment and spread.	More appropriate wording	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[225]	46	Editorial	Many plants as pests are opportunists with a strong potential to become established in disturbed habitats. Plants with a robust dormancy combined with a prolific reproductive ability are particularly suited for such an opportunistic strategy. Disturbed habitats are common; therefore plants with such adaptations ~~will~~ may encounter ~~relatively more~~ many opportunities for establishment and spread.	More appropriate wording	European Union
[226]	46	Substantive	Many plants as pests are opportunists with a strong potential to become established in disturbed habitats. Plants with a robust dormancy combined with a prolific reproductive ability are particularly suited for such opportunistic strategy. Disturbed habitats are common; therefore plants with such opportunistic adaptations will encounter relatively more opportunities for establishment and spread.	The suggested change should improve the clarity of the sentence's meaning.	United States of America
[227]	46	Substantive	Many plants as pests are opportunists with a strong potential to become established in disturbed habitats also because the absence of this natural enemies. Plants with a robust dormancy combined with a prolific reproductive ability are particularly suited for such opportunistic strategy. Disturbed habitats are common; therefore plants with such adaptations will encounter relatively more opportunities for establishment and spread.	Beside their strong potential to establish, it must be consider the lack of regulation by their natural enemies	Mexico
[228]	48	Editorial	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. ~~These~~ Natural factors include:	Further only natural factors are provided, not human-mediated factors which are mentioned later.	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[229]	48	Substantive	The likelihood and extent of spread from intended to unintended habitats in PRA area ~~locations~~ depends on natural and human-mediated factors. These factors include:	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat"	Costa Rica ,Nicaragua ,El Salvador

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				covers the meaning of this paragraph.	
[230]	48	Substantive	The likelihood and extent of spread from intended to unintended ~~locations~~ habitats in the PRA area depends on natural and human-mediated factors. These factors include:	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	Uruguay
[231]	48	Substantive	The likelihood and extent of spread from intended to unintended habitats in the PRA area ~~locations~~ depends on natural and human-mediated factors. These factors include:	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	COSAVE,Paraguay ,Chile,Brazil
[232]	48	Substantive	The likelihood and extent of spread ~~from intended to unintended locations~~ depends on natural and human-mediated factors. These factors include:	The key point to consider is spread, it does not need to be qualified by intended or unintended areas.	United States of America
[233]	48	Substantive	The likelihood and extent of spread from intended to unintended habitats in the PRA area~~locations~~ depends on natural and human-mediated factors. These factors include:	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	Argentina
[234]	48	Substantive	The likelihood and extent of spread from intended to unintended habitats in the PRA area ~~locations~~ depends on natural and human-mediated factors. These factors include:	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	OIRSA
[235]	48	Technical	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. These factors may include:	Factors listed are only examples and not a comprehensive list of factors to determine the likelihood and extent of pest spread.	Costa Rica ,Nicaragua
[236]	48	Technical	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. These factors may include:	Factors listed are only examples and not a comprehensive list of factors to determine the likelihood and extent of a pest spread.	Uruguay
[237]	48	Technical	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. These factors may include:	Factor listed are only examples and not a comprehensive list of factors to determine the likelihood and extent of pest spread.	COSAVE,Paraguay ,Chile,Brazil
[238]	48	Technical	The likelihood and extent of spread from intended to unintended ~~locations~~ habitats depends on natural and human-mediated factors. These factors include:	PRA is conducted for a defined area and not for different geographics locations within PRA area. In addition, location is not	Mexico

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				defined as a term in ISPM no. 5.	
[239]	48	Technical	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. These factors may include:	Factor listed are only examples and not a comprehensive list of factors to determine the likelihood and extent of pest spread	Argentina
[240]	48	Technical	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. These factors may include:	Factors listed are only examples and not a comprehensive list of factors to determine the likelihood and extent of a pest spread.	El Salvador
[241]	48	Technical	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. These factors may include:	Factors listed are only examples and not a comprehensive list of factors to determine the likelihood and extent of a pest spread.	OIRSA
[242]	48	Translation	The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors. These factors include:	Translate to Spanish: "The likelihood and extent of spread from intended to unintended locations depends on natural and human-mediated factors", like "La probabilidad y el alcance de la dispersión de ubicaciones previstas a las no previstas depende de factores naturales y de los causados por humanos" Explanation: For better understanding.	OIRSA
[243]	49	Editorial	• intrinsic biological traits of the plant species (in particular regarding reproduction, adaptation and propagule dispersal) • existence of natural vectors (birds and other animals, water) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	For added clarity	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[244]	49	Editorial	• intrinsic traits of the plant species (e.g. in particular regarding reproduction, adaptation and propagule dispersal) • existence of natural vectors (e.g. birds and other animals, water) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	For consistency with use of e.g. in brackets (refer to paragraph 31)	South Africa
[245]	49	Substantive	• intrinsic traits of the plant species (in particular regarding reproduction, adaptation and propagule dispersal) • existence of natural vectors (birds and other animals, water, wind) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.		Indonesia

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[246]	49	Substantive	• intrinsic traits of the plant species (in particular regarding reproduction, adaptation and propagule dispersal) • existence of natural vectors (birds and other animals, water, wind) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	Wind is also a dispersal factor	Yemen ,Oman
[247]	49	Substantive	• intrinsic traits of the plant species (in particular regarding reproduction, adaptation and propagule or seed dispersal) • existence of natural vectors (birds and other animals, water) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	Specific morphological adaptation in seed to disperse.	Mexico
[248]	49	Substantive	• intrinsic traits of the plant species (in particular regarding reproduction, adaptation and propagule dispersal) • existence of natural vectors (wind, birds and other animals, water) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	Wind is a natural means of dispersal	Nigeria
[249]	49	Technical	• intrinsic traits of the plant species (in particular regarding reproduction, adaptation and propagule dispersal) • existence of ~~natural vectors~~ transporter organism (birds and other animals, water) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	Better understanding. Instead of use the term natural vector (of a plant disease) may use transporter organism	Mexico
[250]	49	Technical	• intrinsic traits of the plant species (in particular regarding reproduction, adaptation and propagule dispersal) • existence of natural means of spread~~vectors~~ (water, wind, birds and ~~birds and~~ other animals~~, water~~) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	What is actually described under the second bullet are means of spread. Therefore, suggesting deletion and additional wording for a more exhaustive list than the original text.	Canada
[251]	49	Translation	• intrinsic traits of the plant species (in particular regarding reproduction, adaptation and propagule dispersal) • existence of natural vectors (birds and other animals, water) • existence and spatial pattern of suitable habitats and dispersal corridors connecting them.	Translate to Spanish: "existence and spatial pattern of suitable habitats and dispersal corridors connecting them", like "existencia y distribución espacial de hábitats adecuados y de corredores de dispersión que los conecten". Explanation: for better understanding.	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[252]	50	Editorial	Human-mediated factors may be intentional or unintentional. The probability of intentional spread by human agency depends mainly on the:	Better wording.	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[253]	50	Editorial	~~Human-mediated factors may be intentional or unintentional. The probability of intentional spread by human agency depends mainly on:~~	In paragraph 48 human mediated factors are mentioned in general. These are examples and there is not need to differentiate them intentional and unintentional.	Costa Rica ,Nicaragua ,El Salvador
[254]	50	Editorial	~~Human-mediated factors may be intentional or unintentional. The probability of intentional spread by human agency depends mainly on:~~	In paragraph 48 human mediated factors are mentioned in general. These are examples and there is not need to differentiate them in intentional and unintentional.	Uruguay
[255]	50	Editorial	Human-mediated factors may be intentional or unintentional. The probability of intentional spread by humans ~~agency~~ depends mainly on:	Delete the word "agency" in order to simplify language.	Canada
[256]	50	Editorial	~~Human-mediated factors may be intentional or unintentional. The probability of intentional spread by human agency depends mainly on:~~	In paragraph 48 human mediated factors are mentioned in general. These are examples and there is not need to differentiate them in intentional and unintentional.	OIRSA
[257]	50	Technical	~~Human-mediated factors may be intentional or unintentional. The probability of intentional spread by human agency depends mainly on:~~	Paragraph 48 refer to human mediated factors in a general manner. These are examples and there is not need to diferentiate between intentional and unintentional factors	Mexico
[258]	51	Technical	• intended use of the plants • ~~desirability~~ popularity with customers and gardeners ~~and economic value~~ of the plants • ease of transport of the plants • public awareness about the risk associated with plants as pests.	Providing more clarity of the issue at stake	EPPO,Norway ,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[259]	51	Technical	• intended use of the plants • desirability and economic value of the plants • ease of transport of the plants	Public awareness may be a factor to be considered not only for plants as pest, but for all type of pests. Besides this, it is confusing because we are assessing pest risk which should be comunicated after to	Costa Rica ,Nicaragua ,El Salvador

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• ~~public awareness about the risk associated with plants as pests.~~	create public awareness.	
[260]	51	Technical	• intended use of the plants • desirability and economic value of the plants • ease of transport of the plants • ~~public awareness about the risk associated with plants as pests.~~	Public awareness may be a factor to be considered not only for plant as pests, but for all type of pests. Beside this, it is confusing because we are assessing pest risk, which should be communicated after to create public awareness	Uruguay
[261]	51	Technical	• intended use of the plants • desirability and economic value of the plants • ease of transport of the plants • ~~public awareness about the risk associated with plants as pests.~~	Public awareness may be a factor to be considered not only for plant as pests, but for all type of pests. Beside this, it is confusing because we are assessing pest risk wich should be communicated after to create public awareness.	OIRSA
[262]	52	Editorial	The probability of unintentional spread by human agency depends mainly on the:	Grammar	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[263]	52	Editorial	~~The probability of unintentional spread by human agency depends mainly on:~~	In paragraph 48 human mediated factors are mentioned in general. These are examples and there is not need to differentiate them intentional and unintentional.	Costa Rica ,Nicaragua ,El Salvador
[264]	52	Editorial	~~The probability of unintentional spread by human agency depends mainly on:~~	In para 48 human mediated factors are mentioned in general. These are examples and there is not need to differentiate them in intentional and unintentional.	Uruguay
[265]	52	Editorial	The probability of unintentional spread by humans ~~agency~~ depends mainly on:	Delete the word "agency to simplify language.	Canada
[266]	52	Editorial	~~The probability of unintentional spread by human agency depends mainly on:~~	In para. 48 human mediated factors are mentioned in general. These are examples and there is not need to differentiate them in intentional and unintentional.	OIRSA
[267]	53	Editorial	• probability that propagules will adhere to clothing, vehicles/other means of conveyance, machinery, tools, equipment • probability that propagules will be a contaminant of other products or material.	other means of conveyance takes care of or ther modes of transport other than vehicles	Kenya

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[268]	53	Editorial	• probability that propagules will adhere to clothing, vehicles, machinery, tools, equipment • probability that propagules will be a contaminant of other products or materials.	For the purpose of consistency	Singapore
[269]	53	Technical	• probability that propagules will adhere to clothing, vehicles, machinery, tools, equipment • probability that propagules will be a contaminant of soil or other products or material. • likelihood of being discarded, e.g. after flowering or when private aquariums are being emptied • effectiveness of waste disposal procedures (e.g. composting).	Soil may be a particularly important pathway. Factors added for further guidance.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[270]	53	Technical	• probability that propagules will adhere to clothing, vehicles, machinery, tools, equipment • probability that propagules will be a contaminant of soil or other products or material. • likelihood of being discarded, e.g. after flowering or when private aquariums are being emptied • effectiveness of waste disposal procedures (e.g. composting).	Soil may be a particularly important pathway. Factors added for further guidance.	European Union
[271]	53	Technical	• probability that propagules will adhere to items that may be conveyed to new areas such as clothing, vehicles, machinery, tools, equipment • probability that propagules will be a contaminant of other products or material.	New text is added as the probability of spread is dependant if such items are conveyed to new areas.	Canada
[272]	54	Editorial	There are often long time lags between a~~n~~ plant's initial ~~plant~~ introduction and its later spread. As a consequence, even in the cases where establishment may be well documented, the potential for later spread may be less known. Possible reasons for the time lag include:	Better English	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[273]	54	Substantive	There are often long time lags between an initial plant introduction and its later spread. As a consequence, even in the cases where establishment may be well documented, the potential for later spread may be less known. If evidence exists, the following factors may need to be considered:~~Possible reasons for the time lag include:~~	While it is true that there are many factors that may change and cause a previously established plant to begin spreading after a long period of time, this paragraph may lead some to conclusion "anything can happen". If there is evidence that some of these factors may change or are likely to change, and thus cause the species to	United States of America

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				spread, then they should be considered in the analysis. The sentence that was added to the end of the paragraph should help to keep the guidance and analysis a bit more realistic.	
[274]	55	Editorial	• changes in climate (e.g. ~~such as~~ warmer climate or changes in precipitation patterns) • changes in other abiotic factors (e.g. an increase in aerial deposition of nitrogen or sulphur) • changes in the genetic profile of the plant species (e.g. through natural selection, genetic drift etc.) • emergence of novel uses for the plant • relatively rare dispersal events that move propagules from suboptimal to optimal habitats • changes in land use or disturbance pattern.	For consistency with use of e.g. in brackets (refer to paragraph 31). The use of "such as" is not necessary as "e.g." has been added on the brackets	South Africa
[275]	55	Substantive	• changes in climate (such as warmer climate or changes in precipitation patterns) • changes in other abiotic factors (e.g. an increase in aerial deposition of nitrogen or sulphur) • changes in the genetic profile of the plant species (through natural selection, genetic drift etc.) • long generative time or time to maturity • emergence of novel uses for the plant • relatively rare dispersal events that move propagules from suboptimal to optimal habitats • changes in land use or disturbance pattern (eg bushfire events, floods).	new dot point - Plants which have a short history of introductions to new areas, may be considered to have a long lag time due to their long generative time or long time to maturity. The traits listed here may or may not make a plant a pest. But they all may contribute to a long lag time between a plants initial introduction and its later spread. These are factors that needs to be considered if you are trying to determine a plants ability to spread (i.e. there is no history of spread due to a lack of opportunity to spread). One of the factors overlooked by the authors which contributes to a long lag time is the time it takes to reach sexual reproduction. A plant may be considered to have established (particularly trees with a long life span), without having reached reproductive age which may be necessary for spread to occur. The IPPC definition of establishment does not equate to the widely accepted definition of naturalisation which is for a self sustaining population (which implies that	Australia

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				reproduction age has already been reached). 6th dot point - To provide examples of what a possible change to disturbance patterns might be.	
[276]	55	Substantive	• ~~changes in climate (such as warmer climate or changes in precipitation patterns)~~ • changes in ~~other~~ abiotic factors (e.g. an increase in aerial deposition of nitrogen or sulphur) • changes in the genetic profile of the plant species (through natural selection, genetic drift etc.) • changes in land use or distribution pattern • emergence of novel uses for the plant • relatively rare dispersal events that move propagules from suboptimal to optimal habitats • ~~changes in land use or disturbance pattern~~. • changes in climate (such as warmer climate or changes in precipitation patterns)	For a PRA, an NPPO should be looking for evidence of these, not just saying that there is uncertainty and it may be one of the following. If there is evidence of one of these, it should be added into the PRA. Reorder the bullets, such that bullets 2,3,6 are the first to appear. These bullets should be moved up because they are the most important. For a PRA, an NPPO should be looking for evidence of these, not just saying that there is uncertainty and it may be one of the following. If there is evidence of one of these, it should be added into the PRA.	United States of America
[277]	55	Translation	• changes in climate (such as warmer climate or changes in precipitation patterns) • changes in other abiotic factors (e.g. an increase in aerial deposition of nitrogen or sulphur) • changes in the genetic profile of the plant species (through natural selection, genetic drift etc.) • emergence of novel uses for the plant • relatively rare dispersal events that move propagules from suboptimal to optimal habitats • changes in land use or disturbance pattern.	1) Translate to Spanish: "emergence of novel uses for the plant", like "surgimiento de nuevos usos de la planta" 2) Translate to Spanish: "changes in land use or disturbance pattern", like "cambios en el uso del suelo o en el patrón de perturbación"	El Salvador
[278]	55	Translation	• changes in climate (such as warmer climate or changes in precipitation patterns) • changes in other abiotic factors (e.g. an increase in aerial deposition of nitrogen or sulphur) • changes in the genetic profile of the plant species (through natural selection, genetic drift etc.)	1) Translate to Spanish: "emergence of novel uses for the plant", like "surgimiento de nuevos usos de la planta" 2) Translate to Spanish: "changes in land use or disturbance pattern", like "cambios en el uso del suelo o en el patrón de perturbación"	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• emergence of novel uses for the plant • relatively rare dispersal events that move propagules from suboptimal to optimal habitats • changes in land use or disturbance pattern.		
[279]	56	Editorial	*Assessment of potential economic consequences* (refer to section 2.3)	Word missing	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[280]	56	Editorial	*Assessment of potential economic consequences* (refer to section 2.3)	Word missing	European Union
[281]	57	Editorial	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental ~~consequences~~effects. These may include yield losses or reduction of biodiversity and effects on other parts of the ecosystem ~~components~~. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes ~~of~~ in the nutrient concentration ~~in~~ of the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily ~~quantified~~assessed. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants ~~were intentionally~~ are to be planted.	Improved wording	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[282]	57	Editorial	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental ~~consequences~~effects. These may include yield losses or reduction of biodiversity and effects on other parts of the ecosystem ~~components~~. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes ~~of~~ in the nutrient concentration ~~in~~ of the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily ~~quantified~~assessed. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants ~~were intentionally~~ are to be planted.	Improved wording	European Union
[283]	57	Editorial	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient ~~concentration~~ profile in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that	It is not concentration of nutrients are changed but the composition as well.	Singapore

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			are not easily quantified. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants were intentionally planted.		
[284]	57	Editorial	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of economic consequences of plants as pests may be inherently difficult because these ~~it requires consideration of consequences that~~ are not easily quantifiable~~ed~~. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants were intentionally planted.	For better understanding	OIRSA
[285]	57	Substantive	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences.These may be both positive and negative. The~~se~~y may include yield losses or reduction of biodiversity and effects on other ecosystem components. they may support industries taht deliver a net benefit, such as biofuel production eg *Jatropha*. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants were intentionally planted.	Need to reflect that economic benefits may need to be balcned against negative impacts.	Australia
[286]	57	Substantive	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences ~~for all locations~~ in the PRA area, including where the plants were intentionally planted.	PRA is conducted for a defined area and not for different geographic locations within the PRA area	Uruguay
[287]	57	Substantive	~~Plants as pests, like other pests, can have a variety of direct and indirect~~	This is not needed as it does not add any	United States of America

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			~~economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants were intentionally planted.~~	valuable content to the draft annex and the inherent difficulty of plants as pests is described already in ISPM 11. Also content is redundant with para 58.	
[288]	57	Technical	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses in agriculture, horticulture and forestry, reduction of recreational value or reduction of biodiversity ~~and effects on other ecosystem components~~. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants were intentionally planted.	Providing more details and adding another important concern, whilst avoiding unnecessary repetition.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[289]	57	Technical	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences for ~~all locations in~~ the PRA area, including where the plants were intentionally planted.	As commented in paragraphs 34 and 48, PRA is conducted for a defined area and not for different geographic locations within the PRA area.	Costa Rica ,Nicaragua ,El Salvador
[290]	57	Technical	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily	As comment in para 34 and 48, PRA is conducted for a defined area and not for different geographic locations within the PRA area	COSAVE,Paraguay ,Chile,Brazil

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			quantified. It is important to consider the long-term consequences ~~for all locations~~ in the PRA area, including where the plants were intentionally planted.		
[291]	57	Technical	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses in agriculture, horticulture and forestry, reduction of recreational value or reduction of biodiversity ~~and effects on other ecosystem components~~. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences for all locations in the PRA area, including where the plants were intentionally planted.	Providing more details and adding another important concern, whilst avoiding unnecessary repetition.	European Union
[292]	57	Technical	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences ~~for all locations~~ in the PRA area, including where the plants were intentionally planted.	As comment in para 34 and 48, PRA is conducted for a defined area and not for different geographic locations within the PRA area	Argentina
[293]	57	Technical	Plants as pests, like other pests, can have a variety of direct and indirect economic consequences, including environmental consequences. These may include yield losses or reduction of biodiversity and effects on other ecosystem components. Plants as pests may have broad agricultural, environmental and social consequences that may be non-specific and not readily apparent (e.g. changes of nutrient concentration in the soil). For this reason, evaluation of consequences of plants as pests may be inherently difficult because it requires consideration of consequences that are not easily quantified. It is important to consider the long-term consequences for ~~all locations in~~ the PRA area, including where the plants were intentionally planted.	As commented in para 34 and 48 PRA is conducted for a defined area and not for different geographic locations within the PRA area.	OIRSA
[294]	58	Editorial	~~As for establishment and spread, t~~The most reliable predictor of potential consequences is evidence of consequences elsewhere, particularly in areas with similar habitats. However, in some cases, plants have never been	Unnecessary words.	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			moved out of their native ranges and therefore not had an opportunity to express any potential consequences. In the absence of evidence of consequences elsewhere, consideration may be given to whether or not the plant possesses intrinsic traits that predict pest potential, such as those discussed above and in section 2.2.2.4 related to establishment and spread.		,Uzbekistan
[295]	58	Editorial	As for establishment and spread, the most reliable predictor of potential consequences is evidence of consequences elsewhere, particularly in areas with similar habitats. However, in some cases, plants have never been moved out of their native ranges and therefore not had an opportunity to express any potential consequences. In the absence of evidence of consequences elsewhere, consideration may be given to whether or not the plant possesses intrinsic characteristics ~~traits~~ that predict pest potential, such as those discussed above and in section 2.2.2.4 related to establishment and spread.	To be consistent with the previous comments	OIRSA
[296]	58	Substantive	~~As for establishment and spread,~~ the most reliable predictor of potential consequences is evidence of consequences elsewhere, particularly in areas with similar habitats. However, in some cases, plants have never been moved out of their native ranges and therefore may not have had an opportunity to express any potential consequences. In the absence of evidence of consequences elsewhere, consideration may be given to whether or not the plant possesses intrinsic traits that predict pest potential, such as those discussed above and in section 2.2.2.4 related to establishment and spread.	First, we recommend to delete "As for establishment and spread" because the following point could also apply to other risk factors (e.g., probability of entry). Second, in line 3 change "...therefore not had..." to "therefore may not have had" as editorially more clear. Plants may still express potential consequences if they have not been moved out of their native ranges, so “may not” is more appropriate than “not”.	United States of America
[297]	58	Translation	As for establishment and spread, the most reliable predictor of potential consequences is evidence of consequences elsewhere, particularly in areas with similar habitats. However, in some cases, plants have never been moved out of their native ranges and therefore not had an opportunity to express any potential consequences. In the absence of evidence of consequences elsewhere, consideration may be given to whether or not the plant possesses intrinsic traits that predict pest potential, such as those discussed above and in section 2.2.2.4 related to establishment and spread.	Translate to Spanish: "As for establishment and spread, the most reliable predictor of potential consequences is evidence of consequences elsewhere, particularly in areas with similar habitats", like "En cuanto al establecimiento y la dispersión, el indicador más confiable de las consecuencias potenciales es la evidencia de las mismas en otro lugar, especialmente en áreas con hábitats similares" For better understanding and to avoid redundance.	El Salvador
[298]	58	Translation	As for establishment and spread, the most reliable predictor of potential consequences is evidence of consequences elsewhere, particularly in areas with similar habitats. However, in some cases, plants have never been moved out of their native ranges and therefore not had an opportunity to express any potential consequences. In the absence of evidence of	Translate to Spanish: "As for establishment and spread, the most reliable predictor of potential consequences is evidence of consequences elsewhere, particularly in areas with similar habitats", like "En cuanto	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			consequences elsewhere, consideration may be given to whether or not the plant possesses intrinsic traits that predict pest potential, such as those discussed above and in section 2.2.2.4 related to establishment and spread.	al establecimiento y la dispersión, el indicador más confiable de las consecuencias potenciales es la evidencia de las mismas en otro lugar, especialmente en áreas con hábitats similares" For better understanding and to avoid redundance.	
[299]	59	Editorial	*Conclusion of the pest risk assessment* As for any type of organism, if the risk assessment determines that the plant species represents an unacceptable risk, the PRA may continue with the analysis of pest risk management (Stage 3).	Para 59 should have a separate title Missing words in the paragraph.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[300]	59	Editorial	*Conclusion of the pest risk assessment* As for any type of organism, if the risk assessment determines that the plant species represents an unacceptable risk, the PRA may continue with the analysis of pest risk management (Stage 3).	Para 59 should have a separate title Missing words in the paragraph.	European Union
[301]	59	Editorial	As for any type of organism, if the risk assessment determines that the plant species represents an unacceptable risk, the PRA may continue with the analysis of risk management (Stage 3).	To clarify sentence for better reading	South Africa
[302]	61	Editorial	Plants for planting will usually be introduced into environments suitable for their establishment and growth ~~and establishment~~. In such cases, most pest risk management options would be counterproductive to the intended use. In general, for plants for planting considered as ~~that have the characteristics of~~ quarantine pests, the most effective risk management option may be prohibition (refer to section 3.4.6). However, those plants as a commodity may at the same time have a perceived benefit that may be considered in the decision process following the PRA.	logical word order and improved wording.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[303]	61	Editorial	Plants for planting will usually be introduced into environments suitable for their growth and establishment. In such cases, most risk management options would be counterproductive to the intended use. In general, ~~for~~ plants for planting that have the characteristics of quarantine pests, the most effective risk management option may be prohibition (refer to section 3.4.6). However, those plants as a commodity may at the same time have a perceived benefit that may be considered in the decision process following the PRA.		Korea, Republic of ,Thailand ,Lao People's Democratic Republic,Japan ,Viet Nam ,India
[304]	61	Editorial	Plants for planting will usually be introduced into environments suitable for their establishment and growth ~~and establishment~~. In such cases, most pest risk management options would be counterproductive to the intended use. In general, for plants for planting considered as ~~that have the characteristics of~~ quarantine pests, the most effective risk management	logical word order and improved wording.	European Union

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			option may be prohibition (refer to section 3.4.6). However, those plants as a commodity may at the same time have a perceived benefit that may be considered in the decision process following the PRA.		
[305]	61	Substantive	Plants for planting will usually be introduced into environments suitable for their growth and establishment. In such cases, most risk management options would be counterproductive to the intended use. In general, for plants for planting that have the characteristics of quarantine pests, the most effective risk management option ~~may be~~ is prohibition (refer to section 3.4.6). However, those plants as a commodity may at the same time have a perceived benefit that may be considered in the decision process following the PRA.	"May be" seems too weak in this context. Unlike with other pest types, with plants as pests the pest logically cannot be separated from the plant: It is one and the same thing.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[306]	61	Substantive	Plants for planting will usually be introduced into environments suitable for their growth and establishment. In such cases, most risk management options would be counterproductive to the intended use. In general, ~~for~~ plants for planting that have the characteristics of quarantine pests, the most effective risk management option should ~~may~~ be prohibition (refer to section 3.4.6). However, those plants as a commodity may at the same time have a perceived benefit that may be considered in the decision process following the PRA.		Indonesia
[307]	61	Substantive	Plants for planting will usually be introduced into environments suitable for their growth and establishment. In such cases, most risk management options would be counterproductive to the intended use. In general, for plants for planting that have the characteristics of quarantine pests, the most effective risk management option ~~may be~~ is prohibition (refer to section 3.4.6). However, those plants as a commodity may at the same time have a perceived benefit that may be considered in the decision process following the PRA.	"May be" seems too weak in this context. Unlike with other pest types, with plants as pests the pest logically cannot be separated from the plant: It is one and the same thing.	European Union
[308]	61	Substantive	Plants for planting will usually be introduced into environments suitable for their growth and establishment. In such cases, most risk management options would be counterproductive to the intended use. In general, for plants for planting that have the characteristics of quarantine pests, the most effective risk management option may be prohibition (refer to section 3.4.6). However, those plants ~~as a commodity~~ may at the same time have real ~~a~~ or perceived benefit that may be considered in the decision process following the PRA.	1. The words “as a commodity” to describe these pest plants begs the question how different are these plants to be used as a commodity that they are less a risk and more of a benefit than when used for planting. It is better to leave these words out if what is meant is really speaking of the plants in a general sense. para 64 already provides for such plants to be processed and consumed 2. Some of the benefits are real. They are not necessarily perceived.	Singapore
[309]	63	Editorial	• requirements for growing ~~of~~ plants under confinement	Unnecessary words	EPPO,Russian Federation

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• requirements for harvesting ~~of~~ plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.		,Ukraine ,Morocco ,Uzbekistan
[310]	63	Editorial	• requirements for growing ~~of~~ plants under confinement • requirements for harvesting ~~of~~ plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.	Unnecessary words	European Union
[311]	63	Editorial	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent the posibility of ~~opportunities for~~ reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.	For better understanding	El Salvador
[312]	63	Editorial	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent the possibility of ~~opportunities for~~ reproduction • restriction of plants to particular localities, such as those that are	For better understanding	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.		
[313]	63	Substantive	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • ~~codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.~~	This point should be removed. Codes of conduct are generally voluntary and may or may not contribute to the management of a pest plant. These codes are unlikely to be a management option available to NPPOs when they determine import policy for plants.	Australia
[314]	63	Substantive	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • requirement for pest-free mother stock • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.	This requirement is a precautionary measure, especially if the receiving country does not have enough capacity/capabilty to conduct testing for all kinds of pests and diseases (eg. viruses). It is betther the exporting country provide certification that the plants came from pest/disease free mother stock.	Philippines
[315]	63	Substantive	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material	Will be important to include for example certain code of conduct for the importation of plants for scientific purposes or research	Mexico

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants, for specific purposes.		
[316]	63	Technical	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • import restrictions to specified cultivars or clones • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport, ~~or~~ planting, or disposal • codes of conduct for sale, holding, transport, disposal, ~~or~~ planting or disposal, e.g. in the form of internal rules or guidelines within the plant industry to refrain from or restrict the selling of particular plants.	Adding measures for guidance. A code of conduct may include internal rules or just guidelines.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[317]	63	Technical	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • import restrictions to specified cultivars or clones • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport, ~~or~~ planting, or disposal • codes of conduct for sale, holding, transport, disposal, ~~or~~ planting or disposal, e.g. in the form of internal rules or guidelines within the plant industry to refrain from or restrict the selling of particular plants.	Adding measures for guidance. A code of conduct may include internal rules or just guidelines.	European Union
[318]	63	Technical	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material	It is not a reliable option, because it is not mandatory	El Salvador

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			• other restrictions on sale, holding, transport or planting • ~~codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.~~		
[319]	63	Technical	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • ~~codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.~~	It is not a reliable option, because it is not mandatory	OIRSA
[320]	63	Translation	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the selling of particular plants.	1) Translate to Spanish: "other restrictions on sale, holding, transport or planting", like "otras restricciones sobre venta, almacenamiento, transporte o siembra" More suitable terms in Spanish.	El Salvador
[321]	63	Translation	• requirements for growing of plants under confinement • requirements for harvesting of plants at a certain stage or specified time to prevent opportunities for reproduction • restriction of plants to particular localities, such as those that are marginally suitable • restrictions on the disposal of excess or waste plant material • other restrictions on sale, holding, transport or planting • codes of conduct for sale, holding, transport or planting, e.g. in the form of internal rules within the plant industry to refrain from or restrict the	1) Translate to Spanish: "other restrictions on sale, holding, transport or planting", like "otras restricciones sobre venta, almacenamiento, transporte o siembra" More suitable terms in Spanish.	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			selling of particular plants.		
[322]	64	Substantive	For plants imported for consumption or processing, risk management options may include restrictions on transport, storage, locations, sale, seasonality and requirements regarding the processing or treatments, such as devitalization of seeds.	Give an example as a mitigation measure for spread of seeds for animal feed, for eg	Singapore
[323]	64	Technical	For plants imported for consumption or processing, risk management options may include restrictions on transport, storage, locations of import and use, sale, waste disposal, ~~seasonality~~ time of year that import takes place, and requirements regarding the processing or treatments.	Waste could be a pathway for further spread that may require management. Clarity of what is at stake	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[324]	64	Technical	For plants imported for consumption or processing, risk management options may include restrictions on transport, storage, locations of import and use, sale, waste disposal, ~~seasonality~~ time of year that import takes place, and requirements regarding the processing or treatments.	Waste could be a pathway for further spread that may require management. Clarity of what is at stake	European Union
[325]	64	Translation	For plants imported for consumption or processing, risk management options may include restrictions on transport, storage, locations, sale, seasonality and requirements regarding the processing or treatments.	Translate to Spanish: "seasonality", like "estacionalidad" More suitable term in Spanish	El Salvador
[326]	64	Translation	For plants imported for consumption or processing, risk management options may include restrictions on transport, storage, locations, sale, seasonality and requirements regarding the processing or treatments.	Translate to Spanish: "seasonality", like "estacionalidad" More suitable term in Spanish	OIRSA
[327]	65	Technical	In identifying risk management options, the suitability of control measures, ease of detection, identification and access to the plants, time needed for effective control and difficulty of containment should be considered. For example, plants in highly managed systems such as cropping systems are more easily controlled than plants in natural or semi-natural habitats, or in private gardens. Many of the factors considered under “establishment” and “spread” also influence a plant’s response to control measures and thus the feasibility of control.	Added for guidance	EPPO,Norway ,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[328]	65	Technical	In identifying risk management options, the suitability of control measures, ease of access to the plants, time needed for effective control and difficulty of containment should be considered. For example, plants in highly managed systems such as cropping systems may be ~~are~~ more easily controlled than plants in natural or semi-natural habitats, or in private gardens. Many of the factors considered under “establishment” and “spread” also influence a plant’s response to control measures and thus the feasibility of control.	There may be situations where plants in highly managed systems could be more difficult to control than plants in natural or semi-natural habitats. The qualifier "may" is therefore required.	Canada
[329]	66	Editorial	Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-entry ~~import~~ systems such as surveillance in the PRA area, contingency plans and systems to report new		Korea, Republic of ,Thailand ,Lao People's Democratic

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			occurrences.		Republic,Japan ,Viet Nam ,India
[330]	66	Substantive	Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-import systems such as subjecting imported plant materials to post entry quarantine monitoring, surveillance in the PRA area, contingency plans and systems to report new occurrences.	Post entry monitoring is different from surveillance. This is allowing the plants to be planted in a confined/specified area and monitoring the plants for one season for presence of diseases. If no diseases were found after the post entry period, a clearance can then be issued to the importer.	Philippines
[331]	66	Substantive	~~Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-import systems such as surveillance in the PRA area, contingency plans and systems to report new occurrences.~~ Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post- entry systems such as surveillance in the PRA area, contingency plans and systems to report new occurrences.	consist with the common term.	China
[332]	66	Technical	~~Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-import systems such as surveillance in the PRA area, contingency plans and systems to report new occurrences.~~ Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-import systems such as surveillance in the PRA area, contingency plans and systems to report new occurrences.In case, there is evidence that plant imported become the pest, neccesary action should be taken by NPPO.	Take the occurence situation into account.	China
[333]	66	Technical	Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-import systems such as surveillance in the PRA area, contingency plans and alert systems to report new occurrences.	For better specification	El Salvador
[334]	66	Technical	Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-import systems such as surveillance in the PRA area, contingency plans and alert systems to report new occurrences.	For better specification	OIRSA
[335]	69	Editorial	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in some countries ~~differing~~multiple legislation	more correct	United States of America

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			or authorities may be involved in regulating ~~various~~ different plants as pests. Therefore, risk communication may be particularly important in relation to plants as pests.		
[336]	69	Technical	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in ~~some~~ many countries ~~differing legislation or~~ authorities other than the NPPO ~~may be involved in regulating various plants as pests.~~ have responsibilities under the Convention of Biological Diversity with regard to plants intentionally introduced for planting. Therefore, risk communication may be particularly important in relation to plants as pests.	To be explicit about which authorities the NPPO may have to communicate with, namely those dealing with CBD. Furthermore, 'pest' in the IPPC sense is NPPO domain, whilst other authorities may regulate the plants from other viewpoints and terminology.	EPPO,Norway ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[337]	69	Technical	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as quarantine pests. Therefore, risk communication may be particularly important in relation to plants as quarantine pests.	To be consistent with the title.	Costa Rica ,Uruguay ,Nicaragua ,El Salvador
[338]	69	Technical	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as quarantine pests. Therefore, risk communication may be particularly important in relation to plants as quarantine pests.	To be consistent with the title	COSAVE,Paraguay ,Chile,Brazil
[339]	69	Technical	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in ~~some~~ many countries ~~differing legislation or~~ authorities other than the NPPO ~~may be involved in regulating various plants as pests.~~ have responsibilities under the Convention of Biological Diversity with regard to plants intentionally introduced for planting. Therefore, risk communication may be particularly important in relation to plants as pests.	To be explicit about which authorities the NPPO may have to communicate with, namely those dealing with CBD. Furthermore, 'pest' in the IPPC sense is NPPO domain, whilst other authorities may regulate the plants from other viewpoints and terminology.	European Union
[340]	69	Technical	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as quarantine pests. Therefore, risk communication may be particularly important in relation to plants as quarantine pests.	To be consistent with the title	Mexico
[341]	69	Technical	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as	To be consistent with the title	Argentina

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			purely beneficial. Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants quarantine as pests. Therefore, risk communication may be particularly important in relation to plants as quarantine pests.		
[342]	69	Technical	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as quarantine pests. Therefore, risk communication may be particularly important in relation to plants as quarantine pests.	To be consistent with the title	OIRSA
[343]	69	Translation	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as pests. Therefore, risk communication may be particularly important in relation to plants as pests.	Translate to Spanish: "Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as pests", like "Además, en algunos países pueden aplicarse legislaciones diferentes o pueden participar autoridades distintas en la reglamentación de varias plantas como plagas" Explanation: To clarify	El Salvador
[344]	69	Translation	Plants intentionally introduced for planting may not be perceived as a threat by the public, or by particular stakeholders, who may perceive plants as purely beneficial. Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as pests. Therefore, risk communication may be particularly important in relation to plants as pests.	Translate to Spanish: "Furthermore, in some countries differing legislation or authorities may be involved in regulating various plants as pests", like "Además, en algunos países pueden aplicarse legislaciones diferentes o pueden participar autoridades distintas en la reglamentación de varias plantas como plagas" Explanation: To clarify	OIRSA
[345]	71	Editorial	• consultation with importers and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks departments, nurseries, landscapers) to exchange information on plants as potential pests • publication of lists of plants as regulated pests • labelling of plants in commerce~~,~~ (e.g. explaining the pest risk the plants may pose and under which conditions the pest risk may occur).	Consistent use of brackets when giving examples. The use of a coma before the brackets is inappropriate hence the deletion.	South Africa
[346]	71	Editorial	• consultation with importers and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks ~~departments~~, nurseries, landscapers) to exchange information on plants as	To simplify	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			potential pests • publication of lists of plants as regulated pests • labelling of plants in commerce, ~~e.g.~~ explaining the pest risk the plants may pose and under which conditions the pest risk may occur.		
[347]	71	Substantive	• consultation with importers, academe and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks departments, nurseries, landscapers) to exchange information on plants as potential pests • publication of lists of plants as regulated pests • labelling of plants in commerce, e.g. explaining the pest risk the plants may pose and under which conditions the pest risk may occur.	Most of the experts came from the academe.	Philippines
[348]	71	Technical	• consultation with importers and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks departments, nurseries, landscapers) to exchange information on plants as potential pests • publication of lists of plants as quarantine ~~regulated~~ pests • labelling of plants in commerce, e.g. explaining the pest risk the plants may pose and under which conditions the pest risk may occur.	To be consistent with the title.	Costa Rica ,Uruguay ,Nicaragua ,El Salvador
[349]	71	Technical	• consultation with importers and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks departments, nurseries, landscapers) to exchange information on plants as potential pests • publication of lists of plants as ~~regulated~~ quarantine pests • labelling of plants in commerce, e.g. explaining the pest risk the plants may pose and under which conditions the pest risk may occur.	To be consistent with the title	COSAVE,Paraguay ,Chile,Brazil
[350]	71	Technical	• consultation with importers and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks departments, nurseries, landscapers) to exchange information on plants as potential pests • publication of lists of plants as ~~regulated~~ quarantine pests • labelling of plants in commerce, e.g. explaining the pest risk the plants may pose and under which conditions the pest risk may occur.	To be consistent with the title	Mexico
[351]	71	Technical	• consultation with importers and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks	To be consistent with the title	Argentina

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			departments, nurseries, landscapers) to exchange information on plants as potential pests • publication of lists of plants as ~~regulated~~ quarantinepests • labelling of plants in commerce, e.g. explaining the pest risk the plants may pose and under which conditions the pest risk may occur.		
[352]	71	Technical	• consultation with importers and other governmental and non-governmental organizations (e.g. environmental protection agencies, parks departments, nurseries, landscapers), research institutions or researchers to exchange information on plants as potential pests • publication of lists of plants as quarantine ~~regulated~~ pests • labelling of plants in commerce, e.g. explaining the pest risk the plants may pose and under which conditions the pest risk may occur.	1) Other bodies to make consultation 2) To be consistent with the title	OIRSA
[353]	72	Editorial	[Footnote from paragraph 16]: 1 Invasive alien plants, in the CBD sense, are plants introduced by human agency and threatening biodiversity (see ISPM 5, Appendix 1 (2009)). The term "w~~W~~eed" usually refers to pests of cultivated plants. However, some countries use the term “weed” irrespective of whether cultivated plants or wild flora are at risk, ~~whereas~~ and other countries use the term “noxious weed”, “landscape weed”, “environmental weed” or similar terms to distinguish them from weeds only affecting crops ~~only~~.	Clarity	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[354]	72	Editorial	[Footnote from paragraph 16]: 1 Invasive alien plants, in the CBD sense, are plants introduced by human agency and threatening biodiversity (see ISPM 5, Appendix 1 (2009)). The term "w~~W~~eed" usually refers to pests of cultivated plants. However, some countries use the term “weed” irrespective of whether cultivated plants or wild flora are at risk, ~~whereas~~ and other countries use the term “noxious weed”, “landscape weed”, “environmental weed” or similar terms to distinguish them from weeds only affecting crops ~~only~~.	Clarity	European Union
[355]	72	Technical	[Footnote from paragraph 16]: 1 Invasive alien plants, in the CBD sense, are plants introduced by human agency and threatening biodiversity (see ISPM 5, Appendix 1 (2009)). Weed usually refers to pests of cultivated plants. However, some countries use the term “weed” irrespective of whether cultivated plants or wild flora are at risk, whereas other countries use the term “noxious weed”, “landscape weed”, “environmental weed” or similar terms to distinguish weeds affecting uncultivated habitats from weeds affecting crops only.	Adding new text to clarify the intended meaning of the text.	Canada
[356]	77	Editorial	***1. In*** **ENDORSEMENT, add at the bottom as a new paragraph:**	For clarity	Nigeria

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[357]	79	Editorial	***2. In* SCOPE, add at the bottom as a new paragraph:**	For clarity	Nigeria
[358]	80	Editorial	~~More~~ Specific ~~detailed~~ guidance on PRA for plants as pests is provided in Annex 4.	'Specific' seems more precise	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[359]	80	Technical	More detailed guidance on PRA for plants as quarantine pests is provided in Annex 4.	To be consistent with the title.	Costa Rica ,Uruguay ,Nicaragua ,El Salvador
[360]	80	Technical	More detailed guidance on PRA for plants as quarantine pests is provided in Annex 4.	To be consistent with the title	OIRSA
[361]	81	Editorial	***3. IN* REFERENCES, add the following references:**		Nigeria
[362]	82	Editorial	**ISPM 2.** 2007. Framework for pest risk analysis. Rome, IPPC, FAO. **ICPM.** 2001. Report of the Third Interim Commission on Phytosanitary Measures, Rome, 2-6 April 2001. Rome, IPPC, FAO. **ICPM.** 2005. Report of the Seventh Interim ~~c~~Commission on Phytosanitary Measures, Rome 4-7 April 2005. Rome, IPPC, FAO.	For consistency	Nigeria
[363]	83	Editorial	***4. In* Section 1.4 Conclusion of initiation, *add at the bottom as a new paragraph*:**	For clarity	Nigeria
[364]	84	Technical	~~More detailed guidance on PRA for plants as pests is provided in Annex 4.~~	Delete as unnecessary and confusing. [Error: Had not been part of SC May 2011 output]	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[365]	84	Technical	More detailed guidance on PRA for plants as quarantine pests is provided in Annex 4.	To be consistent with the title.	Costa Rica ,Uruguay ,Nicaragua ,El Salvador
[366]	84	Technical	More detailed guidance on PRA for plants as quarantine pests is provided in Annex 4.	To be consistent with the title	Mexico
[367]	84	Technical	More detailed guidance on PRA for plants as quarantine pests is provided in Annex 4.	To be consistent with the title	OIRSA
[368]	87	Editorial	***6. In* Section 2 Stage 2: Pest Risk Assessment, *add at the bottom as a new paragraph:***	For clarity	Nigeria
[369]	87	Technical	~~***6. In* Section 2 Stage 2: Pest Risk Assessment, *add at the bottom as new paragraph:***~~	Delete this section as this addition is no longer required under Stage 2 as "pre-selection" has been moved up under Stage 1: Initiation. Current text provided under	Canada

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				Stage 1 covers this aspect	
[370]	88	Technical	~~More detailed guidance on pre-selection of plants as pests is provided in Annex 4.~~	Delete as confusing: 'Pre-selection' is mentioned only in ISPM 2.	EPPO,Norway ,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[371]	88	Technical	~~More detailed guidance on pre-selection of plants as pests is provided in Annex 4.~~	Delete the sentence under para. 88 as this addition is no longer required under Stage 2 as "pre-selection" has been moved up under Stage 1: Initiation. Current text provided under Stage 1 covers this aspect.	Canada
[372]	89	Editorial	***7. In* Section 2.1.1.1 Identity of pest, after paragraph 2, *add as a new paragraph:***	For clarity	Nigeria
[373]	91	Editorial	***8. In* Section 2.1.1.2 Presence or absence in PRA area, after paragraph 1, *add as a new paragraph:***	For clarity	Nigeria
[374]	95	Technical	~~*S1*The intended habitat is the place where the plants are intended to grow and the unintended habitat is the place where the plants are not intended to grow.~~ S1The intended habitat is the place where the plants are intended to grow and the unintended habitat is the place where the plants are not intended to grow.	PRA is conducted for a defined area and not for different geographical locations within the PRA area.	Mexico
[375]	97	Editorial	*S1* For p~~P~~lants for planting ~~that are~~ proposed for import~~ed will enter and then~~, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in an intended~~habitat~~ location, probably in substantial numbers and for an indeterminate period. ~~Accordingly, Section 2.2.1 on Entry does not apply.~~ The risk arises because of the ~~probability~~ possibility that the plant may spread from the intended ~~habitat~~ location to unintended~~habitats~~ locations~~within the PRA area~~ within the PRA area, and then establish ~~in those habitats~~there. Accordingly, section 2.2.3 may be considered before section 2.2.2. ~~Unintended habitats may occur in the vicinity of the intended habitat in the PRA area.~~	The relevant locations are actually within the PRA area. Thus those words could stay, even if commonplace.	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[376]	97	Editorial	*S1* For p~~P~~lants for planting ~~that are~~ proposed for import~~ed will enter and then~~, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in an intended~~habitat~~ location, probably in substantial numbers and for an indeterminate period. ~~Accordingly, Section 2.2.1 on Entry does not apply.~~ The risk arises because of the ~~probability~~ possibility that the plant may spread from the intended ~~habitat~~ location to unintended~~habitats~~ locations~~within the PRA~~	The relevant locations are actually within the PRA area. Thus those words could stay, even if commonplace.	European Union

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			~~area~~ within the PRA area, and then establish ~~in those habitats~~there. Accordingly, section 2.2.3 may be considered before section 2.2.2. ~~Unintended habitats may occur in the vicinity of the intended habitat in the PRA area.~~		
[377]	97	Substantive	*S1* For p~~P~~lants for planting ~~that are~~ proposed for import~~ed will enter and then~~, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in an intended~~habitat~~ habitat ~~location~~, probably in substantial numbers and for an indeterminate period. ~~Accordingly, Section 2.2.1 on Entry does not apply.~~ The risk arises because of the ~~probability~~ ~~possibility~~ probability that the plant may spread from the intended ~~habitat~~ habitat ~~location~~ to unintended~~habitats~~ locations~~within the PRA area~~, within the PRA area, and then establish ~~in those habitats~~there. Accordingly, section 2.2.3 may be considered before section 2.2.2. ~~Unintended habitats may occur in the vicinity of the intended habitat in the PRA area.~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph. Because the risk is being assessed, "probability" should be used.	Costa Rica ,Nicaragua ,El Salvador
[378]	97	Substantive	*S1* For p~~P~~lants for planting ~~that are~~ proposed for import~~ed will enter and then~~, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in an intended~~habitat~~ ~~location~~ habitat, probably in substantial numbers and for an indeterminate period. ~~Accordingly, Section 2.2.1 on Entry does not apply.~~ The risk arises because of the ~~probability~~ ~~possibility~~ probability that the plant may spread from the intended ~~habitat~~ ~~location~~ habitat to unintended~~habitats~~ ~~locations~~ habitats ~~within the PRA area~~ within the PRA area, and then establish ~~in those habitats~~there. Accordingly, section 2.2.3 may be considered before section 2.2.2. ~~Unintended habitats may occur in the vicinity of the intended habitat in the PRA area.~~	1) PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph. 2) We do not agree to use the term "possibility" instead of "probability" because the risk is being assessed and "probability should be used	Uruguay
[379]	97	Substantive	*S1* For p~~P~~lants for planting ~~that are~~ proposed for import~~ed will enter and then~~, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in an intended~~habitat~~ ~~location~~ habitat, probably in substantial numbers and for an indeterminate period. ~~Accordingly, Section 2.2.1 on Entry does not apply.~~ The risk arises because of the ~~probability~~ ~~possibility~~ probability that the plant may spread from the intended ~~habitat~~ ~~location~~ habitat to unintended~~habitats~~ ~~locations~~ habitats ~~within the PRA area~~ within the PRA area, and then establish ~~in those habitats~~there. Accordingly, section 2.2.3 may be considered before section 2.2.2. ~~Unintended habitats may occur in the vicinity of the intended habitat in the PRA area.~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph. Because risk is being evaluated, probability should be used.	COSAVE,Paraguay ,Chile,Brazil
[380]	97	Substantive	*S1* For p~~P~~lants for planting ~~that are~~ proposed for import~~ed will enter and then~~, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in an intended~~habitat~~ ~~location,~~habitat	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a	Argentina

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			probably in substantial numbers and for an indeterminate period. ~~Accordingly, Section 2.2.1 on Entry does not apply.~~ The risk arises because of the ~~probability~~ ~~possibility~~ probability that the plant may spread from the intended ~~habitat~~ ~~location~~ habitat to unintended~~habitats~~ ~~locations~~ habitats ~~within the PRA area~~, and then establish ~~in those habitats~~there. Accordingly, section 2.2.3 may be considered before section 2.2.2. ~~Unintended habitats may occur in the vicinity of the intended habitat in the PRA area.~~	defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph Because risk is being evaluated, probability should be used	
[381]	97	Substantive	*S1* For p~~P~~lants for planting ~~that are~~ proposed for import~~ed will enter and then~~, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in an intended~~habitat~~ ~~location~~ habitat, probably in substantial numbers and for an indeterminate period. ~~Accordingly, Section 2.2.1 on Entry does not apply.~~ The risk arises because of the ~~probability~~ ~~possibility~~ probability that the plant may spread from the intended ~~habitat~~ ~~location~~ habitat to unintended~~habitats~~ ~~locations~~ habitats ~~within the PRA area~~ within the PRA area, and then establish ~~in those habitats~~there. Accordingly, section 2.2.3 may be considered before section 2.2.2. ~~Unintended habitats may occur in the vicinity of the intended habitat in the PRA area.~~	1) PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph 2) Because the risk is being assessed, “probability” should be used	OIRSA
[382]	98	Editorial	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of such plants ~~as pests proposed for import for intended uses other than planting~~ arises because of the probability that the plants may escape or be diverted from the intended use to an unintended location ~~habitat~~ and establish there.	Simplification of overly complicated text	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[383]	98	Editorial	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of plants as pests proposed for import for reasons other ~~intended uses other~~ than planting arises because of the probability that the plants may escape ~~or be diverted~~ from the pathway ~~intended use to an unintended~~ ~~location~~ ~~habitat~~ and establish ~~there~~somewhere else.	This change is still confusing. In the revision, how can a plant establish in a intended use? Suggest using this as the last sentence: "The pest risk of plants as pests proposed for import for reasons other than planting arises because of the probability that the plants may escape from the pathway and establish somewhere else.	United States of America
[384]	98	Editorial	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of such plants ~~as pests proposed for import for intended uses other than planting~~ arises because of the probability that the plants may escape or be diverted from the intended use to an unintended location ~~habitat~~ and establish there.	Simplification of overly complicated text	European Union

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[385]	98	Substantive	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of plants as pests proposed for import for intended uses other than planting arises because of the probability that the plants may escape or be diverted from the intended use to an unintended ~~location~~ habitat ~~habitat~~ and establish there.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Costa Rica ,Nicaragua ,El Salvador
[386]	98	Substantive	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of plants as pests proposed for import for intended uses other than planting arises because of the probability that the plants may escape or be diverted from the intended use to an unintended ~~location~~ ~~habitat~~ habitat and establish there.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term, and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Uruguay
[387]	98	Substantive	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of plants as pests proposed for import for intended uses other than planting arises because of the probability that the plants may escape or be diverted from the intended use to an unintended ~~location~~ habitat ~~habitat~~ and establish there.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	COSAVE,Paraguay ,Chile,Brazil
[388]	98	Substantive	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of plants as pests proposed for import for intended uses other than planting arises because of the probability that the plants may escape or be diverted from the intended use to an unintended ~~location~~ ~~habitat~~ habitat and establish there.	location in not a term defined in ISPM 5, like is the case of habitat that is a defined term in ISPM 5	Mexico
[389]	98	Substantive	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of plants as pests proposed for import for intended uses other than planting arises because of the probability that the plants may escape or be diverted from the intended use to an unintended ~~location~~ ~~habitat~~ habitat and establish there.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph	Argentina
[390]	98	Substantive	*S1* Imported plants not intended to be planted may be used for different purposes (e.g. used as bird seed, as fodder, or for processing). The pest risk of plants as pests proposed for import for intended uses other than planting arises because of the probability that the plants may escape or be diverted from the intended use to an unintended ~~location~~habitat ~~habitat~~ and establish there.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph	OIRSA
[391]	99	Editorial	~~More detailed~~ Specific guidance on the consideration of habitats and unintended locations for plants as pests is provided in Annex 4.	Better wording & consistency	EPPO,European Union ,Russian Federation

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
					,Ukraine ,Morocco ,Uzbekistan
[392]	99	Editorial	More ~~detailed~~ guidance on the consideration of habitats and unintended locations for plants as pests is provided in Annex 4.	Suggest anywhere it says "more detailed guidance" be changed to "more guidance" throughout the document (global change) since it is simpler to say "more guidance".	United States of America
[393]	99	Substantive	More detailed guidance on the consideration of habitats and unintended habitats ~~locations~~ for plants as pests is provided in Annex 4.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Costa Rica ,Nicaragua ,El Salvador
[394]	99	Substantive	More detailed guidance on the consideration of habitats and unintended ~~locations~~ habitats for plants as pests is provided in Annex 4.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph	Uruguay
[395]	99	Substantive	More detailed guidance on the consideration of habitats and unintended ~~locations~~ habitats for plants as pests is provided in Annex 4.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	COSAVE,Paraguay ,Chile,Brazil
[396]	99	Substantive	More detailed guidance on the consideration of ~~habitats~~ location and unintended locations for plants as pests is provided in Annex 4.	PRA is conducted for a defined area and not for different geographical location. "Location" is not a term defined in ISPM 5 like is the case of habitat that is already defined term in ISPM 5	Mexico
[397]	99	Substantive	More detailed guidance on the consideration of habitats and unintended ~~locations~~ habitats for plants as pests is provided in Annex 4.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this	Argentina
[398]	99	Substantive	More detailed guidance on the consideration of habitats and unintended ~~locations~~ habitats for plants as pests is provided in Annex 4.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this	OIRSA
[399]	101	Substantive	*S1* The probability of entry need not be assessed for plants that are		Ghana

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			proposed for import. ~~In the case of plants to be imported, the plants will enter and an assessment of probability of entry will not be required.Therefore this section does not apply~~However,the probability of the plant as a pathway of pests ~~the probability of~~ entry needs to be assessed ~~for~~ ~~this section does apply to~~ ~~pests that may be carried by such plants~~ (e.g. contaminating ~~weed~~ seeds carried with seeds imported for planting).		
[400]	101	Substantive	*S1* The probability of entry need not be assessed for plants that are proposed for import. ~~In the case of plants to be imported, the plants will enter and an assessment of probability of entry will not be required.Therefore this section does not apply~~However, the probability of the plant as a pathway for entry of pests needs to be assessed ~~for~~ ~~this section does apply to~~ ~~pests that may be carried by such plants~~ (e.g. contaminating ~~weed~~ seeds carried with seeds imported for planting).	For clarity and emphasis	Gabon ,Cameroon
[401]	101	Technical	*S1* The probability of entry need not be assessed for plants that are proposed for import. ~~In the case of plants to be imported, the plants will enter and an assessment of probability of entry will not be required.Therefore this section does not apply~~However, the probability of entry needs to be assessed for ~~this section does apply to~~ pests that may be carried by such plants (e.g. contaminating ~~weed~~ seeds carried with seeds imported for planting or unintended vegetative plants that may contaminate rooted plants being imported for planting).	Sometimes weed contaminating plants may also establish in rooting media used for raising those plants to be imported for commercial or ornamental purposes.	Kenya
[402]	101	Technical	*S1* The probability of entry need not be assessed for plants that are proposed for import. ~~In the case of plants to be imported, the plants will enter and an assessment of probability of entry will not be required.Therefore this section does not apply~~However, the probability of entry needs to be assessed for ~~this section does apply to~~ pests that may be carried by such plants, including seeds carried with seeds imported for planting, where applicable ~~(e.g. contaminating weed seeds carried with seeds imported for planting).~~	New text is provided and the text in brakets is deleted as this second sentence applies to all types of pests including, but not limited to, weed seeds.	Canada
[403]	101	Technical	*S1* The probability of entry need not be assessed for plants that are proposed for import. ~~In the case of plants to be imported, the plants will enter and an assessment of probability of entry will not be required.Therefore this section does not apply~~However, the probability of the plant as pathway for entry of other pests need~~s~~ to be assessed for ~~this section does apply to~~ ~~pests that may be carried by such plants~~ (e.g. contaminating ~~weed~~ seeds carried with seeds imported for planting).	To avoid repetition	Nigeria
[404]	102	Editorial	~~More detailed~~ Specific guidance on the probability of entry for plants as pests is provided in Annex 4.	Better wording & consistency	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
					,Uzbekistan
[405]	104	Editorial	*S1* In the case of plants ~~to be imported~~ as pests, the assessment of the probability of establishment concerns the establishment in unintended locations ~~unintended habitats.~~	According to the draft provided	Russian Federation
[406]	104	Editorial	*S1* In the case of plants~~to be imported~~ as pests, the assessment of the probability of establishment concerns their establishment in unintended locations~~unintended habitats~~.	Amendment proposed to be gramatically correct.	Canada
[407]	104	Substantive	*S1* In the case of plants~~to be imported~~ as pests, the assessment of the probability of establishment concerns the establishment in unintended habitats ~~locations~~~~unintended habitats~~.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Costa Rica ,Mexico ,Nicaragua ,El Salvador
[408]	104	Substantive	*S1* In the case of plants~~to be imported~~ as pests, the assessment of the probability of establishment concerns the establishment in unintended ~~locations~~ habitats ~~unintended habitats~~.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph	Uruguay
[409]	104	Substantive	*S1* In the case of plants~~to be imported~~ as pests, the assessment of the probability of establishment concerns the establishment in unintended ~~locations~~ habitats ~~unintended habitats~~.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	COSAVE,Paraguay ,Chile,Brazil
[410]	104	Substantive	*S1* In the case of plants~~to be imported~~ as pests, the assessment of the probability of establishment concerns the establishment in unintended ~~locations~~~~unintended habitats~~ habitats.	According to the draft provided. It is much more widely. We can not determine precisely, in which locations, places pest can establish, but we can say in which byotopes/habitats they can distribute and therefore in this way estimation can be done. Other way it is impossible. That is why we deleted 'determine'in 34.para. We can only sometimes identify suitable habitats, not determine precise locations. Example of clavibacter michiganensis - we will not be able to mention all locations, where it can establish.	Russian Federation
[411]	104	Substantive	*S1* In the case of plants~~to be imported~~ as pests, the assessment of the probability of establishment concerns the establishment in unintended ~~locations~~ habitats ~~unintended habitats~~.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a	Argentina

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
				defined term and the ISPM 5 term “habitat” covers the meaning of this	
[412]	104	Substantive	*S1* In the case of plants~~to be imported~~ as pests, the assessment of the probability of establishment concerns the establishment in unintended habitats ~~locations~~~~unintended habitats~~.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this.	OIRSA
[413]	105	Editorial	More detailed guidance on the probability of establishment~~, including considerations on the intended use,~~ of plants as pests is provided in Annex 4.	Unnecessary words	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[414]	105	Editorial	Specific ~~More detailed~~ guidance on the probability of establishment~~, including considerations on the intended use,~~ of plants as pests is provided in Annex 4.	Unnecessary words	European Union
[415]	107	Substantive	*S1* In the case of plants ~~to be imported~~as pests, the assessment of spread concerns spread from the intended habitats ~~location~~ ~~habitat~~ or the intended use to ~~an~~ unintended habitats ~~locations~~~~habitat,~~ where the plant ~~pest~~ may establish. Further spread may then occur to other unintended ~~habitats~~ habitats ~~locations~~.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Costa Rica ,Mexico ,Nicaragua ,El Salvador
[416]	107	Substantive	*S1* In the case of plants ~~to be imported~~as pests, the assessment of spread concerns spread from the intended ~~location~~ ~~habitat~~ habitat or the intended use to ~~an~~ unintended habitats ~~locations~~~~habitat,~~ where the plant ~~pest~~ may establish. Further spread may then occur to other unintended ~~habitats~~ ~~locations.~~ habitats.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph	Uruguay
[417]	107	Substantive	*S1* In the case of plants ~~to be imported~~as pests, the assessment of spread concerns spread from the intended ~~location~~ habitat ~~habitat~~ or the intended use to ~~an~~ unintended ~~locations~~ habitat ~~habitat,~~ where the plant ~~pest~~ may establish. Further spread may then occur to other unintended ~~habitats~~ habitat ~~locations~~.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this paragraph.	COSAVE,Paraguay ,Chile,Brazil
[418]	107	Substantive	*S1* In the case of plants ~~to be imported~~as pests, the assessment of spread concerns spread from the intended l~~ocation~~ ~~habitat~~ habitat or the intended use to ~~an~~ unintended ~~locations~~~~habitat,~~ habitatswhere the plant ~~pest~~ may establish. Further spread may then occur to other unintended ~~habitats~~ ~~locations~~ habitats ~~.~~	RA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this	Argentina
[419]	107	Substantive	*S1* In the case of plants ~~to be imported~~as pests, the assessment of spread concerns spread from the intended habitat ~~location~~ ~~habitat~~ or the intended use to ~~an~~ unintended habitats ~~locations~~~~habitat,~~ where the plant ~~pest~~ may establish. Further spread may then occur to other unintended ~~habitats~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat”	OIRSA

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			habitatslocations.	covers the meaning of this.	
[420]	108	Editorial	More detailed Specific guidance on probability of spread after establishment, including considerations on the intended use, of plants as pests is provided in Annex 4.	Unnecessary words	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[421]	109	Editorial	***13. In* Section 2.3 Assessment of potential economic consequences, after paragraph 2 *add as a new paragraph*:**	For clarity	Nigeria
[422]	110	Editorial	More detailed Specific guidance on potential economic impact of plants as pests is provided in Annex 4.	Unnecessary words	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[423]	113	Technical	• pests affecting uncultivated/unmanaged plants • weeds and/or invasive plants as pests and • pests affecting plants through effects on other organisms.	To be consistent with para 15	Paraguay
[424]	115	Editorial	*S1* In the case of plants for planting to be imported for plantingthat may be pests, the long-term consequences even for the intended location habitat may be included in the assessment. Planting may affect further use or have a harmful effect on the intended that the intended habitatlocation.	Unnecessary and confusing word. 'The intended' clearer than 'that'	EPPO,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[425]	115	Editorial	*S1* In the case of plants for planting to be imported for plantingthat may be pests, the long-term consequences even for the intended location habitat may be included in the assessment. Planting may affect further use or have a harmful effect on the intended that the intended habitatlocation.	Unnecessary words and a confusing word. 'The intended' clearer than 'that'	European Union
[426]	115	Substantive	*S1* In the case of plants for planting to be imported for plantingthat may be pests, the long-term consequences even for the intended location habitat habitat may be included in the assessment. Planting may affect further use or have a harmful effect on the intended that habitat habitat location.	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph.	Costa Rica ,Nicaragua ,El Salvador ,OIRSA
[427]	115	Substantive	*S1* In the case of plants for planting to be imported for plantingthat may be pests, the long-term consequences even for the intended location habitat habitat may be included in the assessment. Planting may affect further use or have a harmful effect on the intended that habitatlocation. habitat	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat" covers the meaning of this paragraph	Uruguay
[428]	115	Substantive	*S1* In the case of plants for planting to be imported for plantingthat may be pests, the long-term consequences even for the intended location habitat habitat may be included in the assessment. Planting may affect further use	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term "habitat"	COSAVE,Paraguay ,Chile,Brazil

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			or have a harmful effect on ~~the intended~~ that ~~habitat~~~~location~~ habitat .	covers the meaning of this paragraph.	
[429]	115	Substantive	*S1* In the case of plants for planting ~~to be imported for planting~~that may be pests, the long-term consequences even for the intended location ~~habitat~~ may be included in the assessment. Planting may affect further use or have a harmful effect on ~~the intended~~ that ~~habitat~~ habitat ~~location~~.	PRA is conducted for a defined area and not for different geographical location. "Location" is not a term defined in ISPM 5 like is the case of habitat that is already defined term in ISPM 5	Mexico
[430]	115	Substantive	*S1* In the case of plants for planting ~~to be imported for planting~~that may be pests, the long-term consequences even for the intended ~~location~~ ~~habitat~~ habitat may be included in the assessment. Planting may affect further use or have a harmful effect on ~~the intended~~ that ~~habitat~~~~location~~ habitat ~~.~~	PRA is conducted for a defined area and not for different geographic locations within the PRA area. In addition, location is not a defined term and the ISPM 5 term “habitat” covers the meaning of this	Argentina
[431]	117	Editorial	For example, a ~~minor weed~~ ~~plant that is a minor pest~~ a plant as pest that has minor impact on plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock.	Clearer wording	EPPO,Ukraine ,Morocco ,Uzbekistan
[432]	117	Editorial	For example, a ~~minor weed~~ ~~plant that is a minor pest~~ plant as pest that has minor impact on plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock.	Clearer wording	European Union
[433]	117	Substantive	For example, a ~~minor weed~~ ~~plant that is a minor~~ ~~pest~~ a plant as a pest that has minor impact on plants may be significantly allergenic for humans or a minor plant pathogen may produce toxins that seriously affect livestock.	These plants may have minor impact on plants, but still be an important pest because they may affect other things. This is specific example. It does not have to enclose everything. Otherwise we are saying already to strong that it has minor impact on plants, therefore problems may arise for the future to enclose Invasive alien plant species in pest lists.The same comment as from IPPC Russian Regional Workshop.	Russian Federation
[434]	118	Editorial	***17. In* Section 3. Stage 3: Pest Risk Management, *add at the bottom as a new paragraph*:**	For clarity	Nigeria
[435]	121	Technical	~~weeds and/or invasive~~ plants as pests ~~and~~	To harmonize with the rest of the text.	United States of America
[436]	121	Technical	~~weeds and/or invasive~~ plants as pests ~~and~~	To be consistent with para 15	Paraguay
[437]	123	Technical	*S1* The concept of consignments of pests may be applied to the import of plants ~~considered to be~~as considered to be pests. ~~These consignments~~~~Import~~ These consignments may be restricted to species or	Keep original wording: The content does not seem to conflict with that of Annex 4.	EPPO,Norway ,European Union ,Russian Federation ,Ukraine

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
			varieties posing less risk.		,Morocco ,Uzbekistan
[438]	123	Technical	*S1* The concept of consignments of pests may be applied to the import of plants ~~considered to be~~as pests. ~~These consignments~~Import may be restricted to species or varieties posing ~~less risk.~~ risk low	In Section 3.4.1 of ISPM 11, Options for consignments, paragraph 3,modify as follows because the sentence is unclear. Must be understood that it refers to species or varieties that have risk low. If translated, it means that species or varieties with less risk.	Mexico
[439]	125	Technical	*S1* For plants ~~to be imported~~~~as pests~~, to be imported, where there is a high level of uncertainty regarding pest risk, it may be decided not to take phytosanitary measures at import, but only to apply surveillance or other procedures after entry (e.g. by or under the supervision of the NPPO).	Keep original wording. The para may be read as a general statement about any kind of import, not only about plants as pests.	EPPO,Norway ,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[440]	126	Editorial	***21. In* Section 3.6 Conclusion of pest risk management, *add at the bottom as a new paragraph*:**	For clarity	Nigeria
[441]	127	Editorial	~~More detailed~~ Specific guidance on risk communication for plants as pests is provided in Annex 4.	Better wording & consistency	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[442]	127	Substantive	More detailed guidance on risk communication for plants as pests is provided in Annex 4.	suggest to add: 3.7 Risk Communication in the text of ISPM 11, as in current text it is lack of risk communication which is important part.	China
[443]	129	Editorial	The coverage of the IPPC definition of ~~plant~~ pests includes ~~weeds~~ plants as pests (e.g. weeds), and other species that have indirect effects on plants, and the Convention applies to the protection of wild flora.	For consistency and clarity.	EPPO,European Union ,Russian Federation ,Ukraine ,Morocco ,Uzbekistan
[444]	129	Substantive	The coverage of the IPPC definition of ~~plant~~ pest~~s~~ includes ~~weeds~~ plants as pests, and other species that have indirect effects on plants, and the Convention applies to the protection of wild flora.	Per the deletion of the glossary term plant pest, it is proposed to change "plant pest" to "pest". This should be a global change.	Yemen ,Oman
[445]	129	Technical	The coverage of the IPPC definition of ~~plant~~ pest~~s~~ includes ~~weeds~~ plants as pests, and other species that have indirect effects on plants, and the Convention applies to the protection of wild flora.	The definition of "plant pest" directs you to the definition of "pest " in ISPM 5.	Costa Rica ,Nicaragua ,El Salvador
[446]	129	Technical	The coverage of the IPPC definition of ~~plant~~ pest~~s~~ includes ~~weeds~~ plants as pests, and other species that have indirect effects on plants, and the Convention applies to the protection of wild flora.	The definition of plant pest directs you to the definition of "pest" in ISPM5. On the other hand, the deletion of this term from the ISPM 5 is under member consultation.	Uruguay

Comment no.	Paragraph no.	Comment type	Comment	Explanation	Country
[447]	129	Technical	The coverage of the IPPC definition of ~~plant~~ pests includes ~~weeds~~ plants as pests, and other species that have indirect effects on plants, and the Convention applies to the protection of wild flora.	According with definition of pest defined in ISPM 5	Mexico
[448]	129	Technical	The coverage of the IPPC definition of ~~plant~~ pest~~s~~ includes ~~weeds~~ plants as pests, and other species that have indirect effects on plants, and the Convention applies to the protection of wild flora.	The definition of plant pest directs you to the definition of “pest” in ISPM 5	OIRSA
[449]	131	Substantive	In addition to pests that directly affect host plants, there those ~~are those like most~~ ~~weeds/invasive~~ plants as pests, which affect their hosts plants ~~primarily~~ by ~~other~~ processes such as competition (e.g. for cultivated plants: Canada thistle (*Cirsium arvense*) ~~[weed of agricultural crops]~~, or for uncultivated/unmanaged plants: Purple loosestrife (*Lythrum salicaria*)). ~~[competitor in natural and semi-natural habitats]).~~	Clarity to provide more information	Ghana
[450]	131	Substantive	In addition to pests that directly affect host plants, there are those like most other~~weeds/invasive~~ plants as pests, which affect their hosts plants primarily by other processes such as competition (e.g. for cultivated plants: Canada thistle (*Cirsium arvense*) ~~[weed of agricultural crops]~~, or for uncultivated/unmanaged plants: Purple loosestrife (*Lythrum salicaria*)). ~~[competitor in natural and semi-natural habitats]).~~	Clarity toprovide more information	Nigeria
[451]	131	Substantive	In addition to pests that directly affect host plants, there are other ~~those like most~~ ~~weeds/invasive~~ plants as pests, which affect their hosts ~~plants primarily~~ by ~~other~~ processes such as competition (e.g. for cultivated plants: Canada thistle (*Cirsium arvense*) ~~[weed of agricultural crops]~~, or for uncultivated/unmanaged plants: Purple loosestrife (*Lythrum salicaria*)). ~~[competitor in natural and semi-natural habitats]).~~	Clarity to provide more information	Gabon ,Cameroon
[452]	131	Technical	In addition to pests that directly affect host plants, there are those like most ~~weeds/invasive~~ plants as pests (e.g. weeds and invasive , which affect plants primarily by other processes such as competition (e.g. for cultivated plants: ~~Canada thistle (~~*Cirsium arvense*~~)~~ (Canada thistle) ~~[weed of agricultural crops]~~ in many countries, or for uncultivated/unmanaged plants: ~~Purple loosestrife (~~*Lythrum salicaria*~~)~~ (Purple loosestrife) in North America). ~~[competitor in natural and semi-natural habitats]).~~	To explain that the cited examples are not considered pests everywhere, cf. para 14 in Annex 4 Scientific names should be stated first.	EPPO,Norway ,Ukraine ,Morocco ,Uzbekistan
[453]	131	Technical	In addition to pests that directly affect host plants, there are those like most ~~weeds/invasive~~ plants as pests (e.g. weeds and invasive plants), which affect plants primarily by other processes such as competition (e.g. for cultivated plants: ~~Canada thistle (~~*Cirsium arvense*~~)~~ (Canada thistle) ~~[weed of agricultural crops]~~ in many countries, or for uncultivated/unmanaged plants: ~~Purple loosestrife (~~*Lythrum salicaria*~~)~~ (Purple loosestrife) in North America). ~~[competitor in natural and semi-natural habitats]).~~	To explain that the cited examples are not considered pests everywhere, cf. para 14 in Annex 4 Scientific names should be stated first.	European Union