



2009-003: Draft ISPM - International movement of seeds

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1.	G	Editorial		On an editorial level it is suggested that generalizations and over repetition of words should be avoided as far as possible, as indicated at various places in our specific comments. To improve consistency, it is recommended that defined Glossary terms be used throughout in preference to non-defined terms. This Draft ISPM will be able to provide valuable information regarding the international movement of seed after some attention has been given to various editorial and technical matters to bring it up to the standard with other ISPMs. This is sure to provide a useful guide after the review and editing process.	South Africa
2.	G	Substantive	I support the document as it is and I have no comments		Lao People's Democratic Republic, APPPC, Georgia, Nepal
3.	G	Substantive	<u>The "seeds" in this standard covers the seeds not for planting, which is different with the current definition of the seeds in ISPM5.</u>	Recommend TPG to reconsider the definition of seeds in ISPM5.	China
4.	G	Substantive	<u>1. The term of intended use of seeds should be modified in the all over the document to accomly with the agreed new defination of Seeds in the ISPM5, which is (seeds for planting).</u>  <u>2. Delete the paragraphs 57-72</u>  <u>3. Repalce paragraph 56 by the Intended Use of seeds is planting. Seeds to be u sed under specific conditions should be submitted to specific phytosanitary meas ures according to the results of PRA</u>	For consistency with the intended use difination	NEPPO
5.	G	Substantive	<u>In reference to Paragraph 30: The structure of the sentence gives rise to various interpretation. It therefore need to be revised. In addition in relation to the phras e 'further growth' it was not clear what subject it was referring to (the seed or the</u>	The paragraph is not clear. It needs amending	Jamaica, Saint Kitts And Nevis, Dominica,

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			<a href="#">pest</a> ).		Barbados, Antigua and Barbuda
6.	G	Substantive	<p><a href="#">1. The term of intended use of seeds should be modified in the all over the document to comply with the agreed new definition of Seeds in the ISPM5, which is (seeds for planting)</a></p> <p><a href="#">2. Delete the paragraphs 57-72</a></p> <p><a href="#">3. Replace paragraph 56 by the Intended Use of seeds is planting. Seeds to be used under specific conditions should be submitted to specific phytosanitary measures according to the results of PRA</a></p>	For consistency with the intended use definition	Bahrain, Morocco
7.	G	Substantive	<a href="#">We are submitting this general comment and we strongly express, that this draft was not in conditions to be sent for member consultation, it also contains an appendix under development. We request the SC to send it back to the EWG after member consultation to analyze comments and to adjust the draft text to the Specification. We are also submitting specific comments to improve the draft text.</a>	1) Draft text under consultation does not comply with scope and purpose of Specification 54. It only considers issues related to assist NPPO to identify, assess and manage the pest risk associated with the international movement of seeds and issues related to inspection and testing.. According to the specification 54 the standard may also facilitate the international movement of seeds through increased harmonization of phytosanitary import requirements and it should identify and describe specific phytosanitary measures that could be used to reduce pest risk. 2) Tasks of specification 54 are partially considered. Task 2 requested the EWG to identify information and provide guidance to determine potential pests and the potential of seeds as pathways for their introduction and spread that may be used in PRA conducted according to ISPM 2, 11 and 21. Although the draft refers to regulated pests, no specific mention to regulated non-quarantine pests is made. In relation to intended use, Task 3 requested the EWG to consider the relationship between the potential for pests to establish and the intended use of the seeds, distinguishing between seeds intended for field sowing without restrictions versus those seeds intended for research and	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

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				<p>development. Other purposes are included in the draft text like seeds for testing, that cannot be considered an intended use. The draft refers to “intended use” of seeds to refer to the purpose for which seeds are imported, but seeds are intended for planting (ISPM 5). Task 5 requested the EWG to identify the phytosanitary import requirements most commonly used by NPPOs in relation to seed consignments but they are not identified (e.g pest free consignment by field testing, or by laboratory testing). Considering that mentioned above the scope should be revised to adjust it to the content of the text. 3) Section Requirements seems to be a detail of what NPPO of importing country requires for PRA. Section 1.1 describes how to determine the seed as a pathway and section 1.2 how to consider the different purposes for which seeds are moved in international trade in relation to pest risk, indicating a ranking of pest risk and also indicating if it corresponds to analyse a phytosanitary measure or not Both sections refer to first stages of PRA and in these stages phytosanitary measures should not be mentioned, because if the assessed risk is determined to be negligible, the PRA will stop and it does not continue to the next stage, the pest risk management stage, where pest risk management options will be identified. 4) There is a confusion in the use of terms, mainly in the use of the term “phytosanitary measure” throughout the text. 5) References to ISPMs should also be revised; sometimes there are errors when referring to the content of the cited ISPMs. ISPM 13 in section 2 is wrongly cited in item “prohibition”. 6) In section 3 “Equivalence of phytosanitary measures” it is not clear if it refers to a request of the NPPO of the exporting country regarding the measures established in the PRA, or to the application of an equivalent measure by the NPPO of the importing country, regarding a non-compliance upon arrival</p>	

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				<p>of the seeds. In addition any reference to ISPM 24 is included 7) Section 5 "Phytosanitary certification" refers only to re-export of seeds and not to the export process. 8) In Section 5.2 "Mixing and blending of seeds", the concepts of these terms are explained, and some provisions of ISPM 12 are given, but no additional guidance is provided. Thus it should be further developed. On the other hand, the draft does not provide guidance for pest risk assessment for mixing and blending of seeds as requested in task 4 of Specification N° 54. In general, although the draft considers items included in task 4, the draft does not provide detailed guidance on the elements mentioned in this task. 9) We are submitting specific comments to improve text and we are suggesting reordering the draft structure according the following Table of contents: TABLE OF CONTENTS Scope References Definitions Outline of Requirements BACKGROUND IMPACT ON BIODIVERSITY AND THE ENVIRONMENT REQUIREMENTS 1. Pest risk analysis 1.1 Seeds as pathway 1.2 Purpose of seeds import 1.3 Mixing and blending of seeds 1.4 Pest Risk Mangement 1.4.1 Seed certification schemes (section 2.1 of the draft under member consultation, including he relevant measures for pest risk Management described in section 2.6 of current draft) 1.4.2 Resistant varieties 1.4.3 Seed treatments (item 2.4 of the draft under consultation including in this item relevant content of Appendix 2, which we suggest to delete) 2. Phytosanitary measures 2.1 Consignment inspection and testing for freedom of a pest, 2.2 Field inspection for freedom of a pest, 2.3 Pest free areas, areas of low pest prevalence, pest free places of production, pest free production sites 2.4 Phytosanitary treatments 2.5 Post entry quarantine 2.6 Prohibition 3. Equivalence of phytosanitary measures 4. Specific requirements</p>	

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				4.1 Inspection 4.1.1 Inspection of seeds 4.1.2 Field inspection 4.2 Sampling 4.2.1 Sampling of consignments of small quantity of seeds 4.3 Pest diagnosis 4.3.1 Serological and molecular diagnostic protocols 4.3.2 Treated seeds 4.4 Importation of small seed Consignments 5. Re-export of seeds (section 5 of the draft under consultation) 5.1 General considerations 6. Record keeping 10) Finally, translation into Spanish should also be revised. "Movement" should be translated as "movimiento", "management" as "manejo" (throughout the text), "Seed borne pest" as "Plaga transportada por semilla" (paragraph 27); "Processing" as "procesamiento" (paragraph 30), "Potential" as "potencial" (paragraphs 32, 47, 52), "Harvest" as "cosecha" (paragraph 33), "post harvest" as "pos cosecha" (paragraph 33), "Health" as "sanidad" (paragraph 44), "crop" as "cultivo" (paragraph 51), "Field conditions" as "condiciones de campo" (paragraph 53)	
8.	G	Substantive	<u>In reference to Paragraph 30: The structure of the sentence gives rise to various interpretation. It therefore need to be revised. In addition in relation to the phrase 'further growth' it was not clear what subject it was referring to (the seed or the pest).</u>  <u>With reference to paragraph 149 countries have issues with specific tests for detection of pest and diseases on seeds therefore exporting countries should be responsible for certification of seeds</u>	The paragraph is not clear. It needs amending Not all countries may have the resources required for testing	Trinidad and Tobago
9.	G	Substantive	<u>After consideration we find that this document provides good background training material for NPPO and industry personnel not familiar with the seed industry. We note also, that the draft does provide some of the "guidance" requested in the specification for the standard. But we do not find that this material constitutes what we normally regard as a standard. This is a good subject introduction document</u>  <u>We regard a standard as providing harmonised requirements for procedures that are used repeatedly and that facilitate trade. In this case, after discussion between NPPO officials and industry members, it is apparent that a standard that would</u>	The comment does not require explanation.	New Zealand

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			<p><u>d facilitate trade would contain specific information on pests recognised internationally to be transmitted by a specific commodity (eg tomato, wheat, brassicas species etc) and also recognised as effective in eliminating such pests from the seed. This draft document does not supply such procedures.</u></p> <p><u>The parts of the specification that are of particular interest to New Zealand were:</u></p> <ul style="list-style-type: none"> <li>- <u>3rd sentence of Scope "The standard may also facilitate the international movement of seed through the increased harmonisation of phytosanitary import requirements."</u></li> <li>- <u>Task 7, 2nd sentence " the annexes and appendixes may, for example, contain references to the major seed-transmitted commodity pests lists, ISTS/ISF-agreed testing methods and test methods for specific pest/host combinations, seed cleaning and treatment methodology."</u></li> </ul> <p><u>The draft document does not supply such harmonised requirements.</u></p> <p><u>We would also note that regarding task 6 in the Specification regarding additional official phytosanitary information is, in our mind, satisfactorily dealt within the revised ISPM 12.</u></p> <p><u>In view of the work that has been put into preparing this draft, New Zealand is reluctant to be unduly critical, particularly as we also approved the specification. However, now having this document, which is, as stated above, a useful subject in the introduction document, we believe that the draft would not constitute an international standard for phytosanitary measures. We think that the standard really required by industry would contain agreed lists of seed transmitted pests (by host) and agreed effective seed treatment methods. We would suggest that CPM of the Standards Committee reconsider this matter.</u></p>		
10.	G	Substantive	<p><u>We strongly express, that this draft was not in conditions to be sent for member consultation considering the amount of comments as well as an entire appendix under development. In this regard we request the SC to send it back to the EWG after member consultation to analyze comments and adjust the draft text to the specification.</u></p>	See comments	Mexico, Costa Rica, Belize

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			<p><u>Taking into account the amount of specific comments that countries in the Latin American region have on this draft, we are submitting only general comments on the different sections of the draft.</u></p> <p><u>1) SCOPE (paragraphs 7 to 9): Draft text under consultation does not comply with scope and purpose of Specification 54. It only considers issues related to assist NPPO to identify, assess and manage the pest risk associated with the international movement of seeds and issues related to inspection, sampling and testing. According to the specification 54 the standard may also facilitate the international movement of seeds through increased harmonization of phytosanitary import requirements and it should identify and describe specific phytosanitary measures that could be used to reduce pest risk.</u></p> <p><u>Although the scope of the draft mentions that it provides guidance on criteria for the harmonization of phytosanitary import requirements this criteria are not included in the text</u></p> <p><u>Tasks of specification 54 are partially considered. Task 2 requested the EWG to identify information and provide guidance to determine potential pests and the potential of seeds as pathways for their introduction and spread that may be used in PRA conducted according to ISPM 2, 11 and 21. Although the draft refers to regulated pests, no specific mention to regulated non-quarantine pests is made.</u></p> <p><u>2) REFERENCES: References to ISPMs should be revised: sometimes there are errors when referring to the content of the cited ISPMs. ISPM 13 in section 2 is wrongly cited in item "prohibition", so we suggest to delete this reference and citation. We are also proposing to add references to ISPMs 1, 22, 24 and 29, and cite these ISPMs in the relevant sections.</u></p> <p><u>3) DEFINITIONS: We are suggesting a change in the definition of the term "seed borne pest" to clarify that seed borne pests include both, those that are seed transmitted and those not transmitted by seed. The proposed definition would be:</u></p> <p><u>- "seed borne pest": a pest that can be found on the seed (externally) or within the seed (internally) but may or may not be seed transmitted.</u></p> <p><u>- In addition "seed borne pest" should be translated into Spanish as "plaga</u></p>		

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			<p><u>transportada por semilla</u></p> <p><u>4) BACKGROUND. The draft uses both term "seed increase" (para 36) and "seed multiplication" (para 56). We suggest revising the use of these terms and use only "seed multiplication". This is for consistency throughout the draft and because it is the correct translation in English of the term commonly used in Spanish speaking.</u></p> <p><u>5) REQUIREMENTS (paragraph 45) should be "GENERAL REQUIREMENTS" and include sections 1 to 3.</u></p> <p><u>6) Section 1.1 Seeds as pathways: This section describes how to determine the seed as a pathway therefore refers to the first stages of PRA, but its content provides little additional guidance to the guidance already provided in ISPM 11. In addition we suggest that Annex 1 mentioned in the last paragraph of this section (paragraph 54) should be an Appendix only for reference purposes.</u></p> <p><u>7) Section 1.2: Intended use: The draft refers to "intended use" of seeds to refer to the purpose for which seeds are imported. Intended use for seeds is planting (ISPMs 5 and 32), so we propose to change the title of this section to "Purpose of seeds". The section describes how to consider the different purposes for which seeds are moved in relation to pest risk, indicating a ranking of pest risk and also indicating if it corresponds to analyze a phytosanitary measure or not. As well as section 1.1 refers to the first stages of PRA, so phytosanitary measures should not be mentioned, because if the assessed pest risk is determined to be negligible, the PRA will stop and it does not continue to the next stage, the pest risk management stage, where pest risk management options will be identified. So we suggest not referring to the phytosanitary measures in each purpose mentioned</u></p> <p><u>In addition, Task 3 in Specification 54, requested the EWG to consider the relationship between the potential for pests to establish and the intended use of the seeds, distinguishing between seeds intended for field sowing without restrictions versus those seeds intended for research and development, but the draft text includes other purposes not included in the specification like seeds for testing, that cannot be considered an intended use.</u></p> <p><u>We suggest to delete in paragraph 68 "seeds imported under post entry</u></p>		



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			<p><u>quarantine with treatment as a phytosanitary measure", because in this section pest risk is still being assessed to determine if phytosanitary measures will be needed. Therefore at this stage we don't know if post entry quarantine with a treatment will be needed.</u></p> <p><u>8) We suggest reordering the draft structure according the following Table of contents:</u></p> <p><u>TABLE OF CONTENTS</u></p> <p><u>Scope</u></p> <p><u>References</u></p> <p><u>Definitions</u></p> <p><u>Outline of Requirements</u></p> <p><u>BACKGROUND</u></p> <p><u>IMPACT ON BIODIVERSITY AND THE ENVIRONMENT</u></p> <p><u>GENERAL REQUIREMENTS</u></p> <p><u>1. Pest risk analysis</u></p> <p><u>1.1 Seeds as pathway</u></p> <p><u>1.2 Purpose of seeds</u></p> <p><u>1.3 Mixing and blending of seeds (section 5.2 of the draft under consultation)</u></p> <p><u>1.4 Pest Risk Management</u></p> <p><u>1.4.1 Seed certification schemes (section 2.1 of the draft under member</u></p>		

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			<p><a href="#">consultation, including the relevant measures for pest risk Management described in section 2.6 of current draft)</a></p> <p><a href="#">1.4.2 Resistant varieties</a></p> <p><a href="#">1.4.3 Seed treatments (item 2.4 of the draft under consultation including in this item relevant content of Appendix 2, which we suggest to delete)</a></p> <p><a href="#">2. Phytosanitary measures</a></p> <p><a href="#">2.1 Consignment inspection and testing for freedom of a pest.</a></p> <p><a href="#">2.2 Field inspection for freedom of a pest.</a></p> <p><a href="#">2.3 Pest free areas, areas of low pest prevalence, pest free places of production, pest free production sites</a></p> <p><a href="#">2.4 Phytosanitary treatments</a></p> <p><a href="#">2.5 Post entry quarantine</a></p> <p><a href="#">2.6 Prohibition</a></p> <p><a href="#">3. Equivalence of phytosanitary measures</a></p> <p><a href="#">4. Specific requirements</a></p> <p><a href="#">4.1 Inspection</a></p> <p><a href="#">4.1.1 Inspection of seeds</a></p> <p><a href="#">4.1.2 Field inspection</a></p>		

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			<p><a href="#">4.2 Sampling</a></p> <p><a href="#">4.2.1 Sampling of consignments of small quantity of seeds</a></p> <p><a href="#">4.3 Pest diagnosis</a></p> <p><a href="#">4.3.1 Serological and molecular diagnostic protocols</a></p> <p><a href="#">4.3.2 Treated seeds</a></p> <p><a href="#">4.4 Importation of small seed Consignments</a></p> <p><a href="#">5. Re-export of seeds (section 5 of the draft under consultation)</a></p> <p><a href="#">5.1 General considerations</a></p> <p><a href="#">6. Record keeping</a></p> <p><a href="#">New section 1.3: We suggest to move current section 5.2 "Mixing and blending of seeds" as a sub section under pest risk analysis. Current section 5.2 explains the concepts of these terms and gives some provisions of ISPM 12, but no additional guidance is provided. Therefore we believe that this section should be further developed by the EWG to provide guidance for assessing pest risk of mixing and blending of seeds as requested in task 4 of Specification N° 54.</a></p> <p><a href="#">New section 1.4 "pest risk management": current section 2 of the draft mixes information to be considered in the pest risk management stage of PRA (e.g. seed certification schemes, resistant varieties) with phytosanitary measures to minimize pest risk (e.g PFA, post entry quarantine), so we propose to separate both including a new sub section 1.4 to describe the information to be considered in pest risk management stage of PRA and to include phytosanitary measures in a separate section.</a></p> <p><a href="#">New sub section 1.4.1 "Seed certification schemes": Include in this subsection current section 2.1 (Seed certification schemes) of the draft as well as the measures relevant for pest risk Management described in current section 2.6</a></p>		

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			<p><u>(Measures for seed production).</u></p> <p><u>New sub section 1.4.2 "Resistant varieties", include in this sub section current section 2.2</u></p> <p><u>New sub section 1.4.3 "Seed treatments": Include in this new sub section current section 2.4 "treatments and concepts included in current Appendix 2. Delete appendix 2.</u></p> <p><u>Section 2 "Phytosanitary measures": Task 5 requested the EWG to identify the phytosanitary import requirements most commonly used by NPPOs in relation to seed consignments but they are not identified (e.g free consignment by field testing, or by laboratory testing). In this regard we suggest to include the following phytosanitary measures "consignment inspection and testing for freedom from a pest" and "field inspection for freedom from a pest" as new sections 2.1 and 2.2, respectively.</u></p> <p><u>Section 2.3 "Pest free areas, pest free places of production and pest free production sites", we suggest to add "areas of low pest prevalence" as another phytosanitary measure.</u></p> <p><u>Section 2.4 Treatments: we suggest to change the title of this section to "phytosanitary treatments" in order to differentiate from seed treatments</u></p> <p><u>9) In section 3 "Equivalence of phytosanitary measures" it is not clear if it refers to a request of the NPPO of the exporting country regarding the measures established in the PRA, or to the application of an equivalent measure by the NPPO of the importing country, regarding a non-compliance upon arrival of the seeds. In addition reference to ISPM 24 should be included</u></p> <p><u>10) Section 4.1.1 Inspection of seeds: We suggest to change the term "lot" by "consignment", because import and export inspections are conducted for consignments, which according ISPM 5 may be composed by one or more lots. This change should be made throughout the draft. The majority of seed borne pests are not detected by inspection and utility of visual examination should not be linked with lot size.</u></p>		

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			<p>11) Section 4.2 "Sampling": According ISPM 5 the term "infestation" includes "infection" therefore only the term infestation should be used at the end of the section</p> <p>12) Section 4.2.1 "Sampling of small lots": Change title of the section to "sampling of consignments with small quantity of seeds". When referring to other means of sampling, reference to non statistical alternatives of sampling should be mentioned in accordance to ISPM 31, and provide the examples proposed in paragraphs 143 and 144 without giving a specific % in the case of fixed proportion samples.</p> <p>13) Section 4.2.2 "Sampling of seeds in sealed containers": Delete the entire section because its content seems a commercial issue rather than technical.</p> <p>14) Section 4.3: "Detection": Change title of section to "Pest diagnosis", glossary term that includes detection and identification. Include reference to Diganostic Protocols adopted by CPM.</p> <p>15) Section 4.4 "Importation of small seed lots": Add reference to ISPM 20 because it provides guidance on import permits.</p> <p>16) Section 5 "Phytosanitary certification" this section does not refer to the entire process of phytosanitary certification, e.g. field inspection, laboratory testing, etc. it refers only to re-export of seeds already harmonized in ISPM 12. Therefore we suggest to change the title to "re-export of seeds". Paragraph 167 is not consistent with ISPM 12, the provision of additional phytosanitary information is based on a voluntary bilateral agreement, under the request of the exporters as it is specifically mentioned in ISPM 12. We also suggest to delete reference to equivalence of measures, because there is an entire section on this issue.</p> <p>17) ANNEX 1: Change it as an appendix for reference purposes. In addition we suggest to change "insects" by "arthropods", because some examples of mites are mentioned in the draft. In addition we suggest to reorder the annex and to move text in paragraphs 197 and 198 under paragraph 182.</p> <p>Change "insects in the field" (section 1.1) by "pre-harvest" and "Stored product</p>		

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			<p><u>insects" by "post-harvest"</u></p> <p><u>18) Finally, translation into Spanish should be revised. "Movement" should be translated as "movimiento", "management" as "manejo" (throughout the text), "Seed borne pest" as "Plaga transportada por semilla" (paragraph 27); "Processing" as "procesamiento" (paragraph 30), "Potential" as "potencial" (paragraphs 32, 47, 52), "Harvest" as "cosecha" (paragraph 33), "post-harvest" as "poscosecha" (paragraph 33), "Health" as "sanidad" (paragraph 44), "crop" as "cultivo" (paragraph 51), "Field conditions" as "condiciones de campo" (paragraph 53).</u></p>		
11.	G	Substantive		<p>The layout of this ISPM does not have a purpose but only the scope, it differs from the previous standards that were drafted. In addition, there should be a clear definition of seeds as it appears throughout the document. The scope of this standard has not been fulfilled. Although the background provides a good description on the problems faced in the international movement of seed, no definite solutions or guidelines for the phytosanitary certification challenges has been provided. Seed also need to be defined stronger in the scope in order to eliminate any uncertainty through this standard. This standard encompasses a magnitude of redundant information on the PRA process, phytosanitary measures, equivalence, etc. Although this may be valuable to some developing and least developing countries, the relevant ISPMs could rather have been cited. Additional examples on various scenarios would have been more appropriate. The biggest challenge from the seed industries is with regard to phytosanitary certifications as follows:</p> <ul style="list-style-type: none"> <li>• Seed is re-exported to destinations that are not always known at the time of production.</li> <li>• Phytosanitary integrity of consignment versus storing conditions of seeds over prolong periods of time</li> <li>• Variations in the wording of additional declarations create obstacles to the international movement of seeds that are re-exported to multiple destinations. NPPOs are requested to use</li> </ul>	South Africa

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				the recommended wording for additional declarations in Appendix 2 in ISPM 12:2011. This needs to be re-emphasized in this ISPM for seeds • Notifications of non-compliance wrt phytosanitary certification is time consuming and with delayed or no feedback from the importing country. A more focused approach wrt phytosanitary certification will definitely be more valuable, especially for re-exports. Case studies wrt different export/re-export scenarios can be simulated in this standard and appropriate additional declarations options can be suggested. This can also be annexed to ISPM 12:2011.	
12.	G	Substantive	<p><u>This draft was not in conditions to be sent for member consultation considering the amount of comments as well as an entire appendix under development. In this regard we request the SC to send it back to the EWG after member consultation to analyze comments and adjust the draft text to the specification.</u></p> <p><u>Taking into account the need of a complete revision of this draft, we only include some specific comments in order to contribute to improve the draft. We also include several general comments performed in the CIPF Latin American Workshop.</u></p> <p><u>1) SCOPE (paragraphs 7 to 9): Draft text under consultation does not comply with scope and purpose of Specification 54. It only considers issues related to assist NPPO to identify, assess and manage the pest risk associated with the international movement of seeds and issues related to inspection, sampling and testing. According to the specification 54 the standard may also facilitate the international movement of seeds through increased harmonization of phytosanitary import requirements and it should identify and describe specific phytosanitary measures that could be used to reduce pest risk.</u></p> <p><u>Although the scope of the draft mentions that it provides guidance on criteria for the harmonization of phytosanitary import requirements this criteria are not included in the text</u></p> <p><u>Tasks of specification 54 are partially considered. Task 2 requested the EWG to identify information and provide guidance to determine potential pests and the potential of seeds as pathways for their introduction and spread that may be</u></p>	General comments	OIRSA

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			<p><u>used in PRA conducted according to ISPM 2, 11 and 21. Although the draft refers to regulated pests, no specific mention to regulated non-quarantine pests is made.</u></p> <p><u>2) REFERENCES: References to ISPMs should be revised; sometimes there are errors when referring to the content of the cited ISPMs. ISPM 13 in section 2 is wrongly cited in item "prohibition", so we suggest to delete this reference and citation. We are also proposing to add references to ISPMs 1, 22, 24 and 29, and cite these ISPMs in the relevant sections.</u></p> <p><u>3) DEFINITIONS: We are suggesting a change in the definition of the term "seed borne pest" to clarify that seed borne pests include both, those that are seed transmitted and those not transmitted by seed.</u></p> <p><u>4) BACKGROUND. The draft uses both term "seed increase" (para 36) and "seed multiplication" (para 56). We suggest revising the use of these terms and use only "seed multiplication". This is for consistency throughout the draft and because it is the correct translation in English of the term commonly used in Spanish speaking.</u></p> <p><u>5) REQUIREMENTS (paragraph 45) should be "GENERAL REQUIREMENTS" and include sections 1 to 3.</u></p> <p><u>6) Section 1.1 Seeds as pathways: This section describes how to determine the seed as a pathway therefore refers to the first stages of PRA, but its content provides little additional guidance to the guidance already provided in ISPM 11. In addition we suggest that Annex 1 mentioned in the last paragraph of this section (paragraph 54) should be an Appendix only for reference purposes.</u></p> <p><u>7) Section 1.2: Intended use: The draft refers to "intended use" of seeds to refer to the purpose for which seeds are imported. Intended use for seeds is planting (ISPMs 5 and 32), so we propose to change the title of this section to "Purpose of seeds". The section describes how to consider the different purposes for which seeds are moved in relation to pest risk, indicating a ranking of pest risk and also indicating if it corresponds to analyze a phytosanitary measure or not. As well as section 1.1 refers to the first stages of PRA, so phytosanitary measures should not be mentioned, because if the assessed pest risk is determined to be negligible, the PRA will stop and it does not continue to the</u></p>		



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			<p><u>next stage, the pest risk management stage, where pest risk management options will be identified. So we suggest not referring to the phytosanitary measures in each purpose mentioned</u></p> <p><u>In addition, Task 3 in Specification 54, requested the EWG to consider the relationship between the potential for pests to establish and the intended use of the seeds, distinguishing between seeds intended for field sowing without restrictions versus those seeds intended for research and development, but the draft text includes other purposes not included in the specification like seeds for testing, that cannot be considered an intended use.</u></p> <p><u>We suggest to delete in paragraph 68 “seeds imported under post entry quarantine with treatment as a phytosanitary measure”, because in this section pest risk is still being assessed to determine if phytosanitary measures will be needed. Therefore at this stage we don't know if post entry quarantine with a treatment will be needed.</u></p> <p><u>8) We suggest reordering the draft structure according the following Table of contents:</u></p> <p><u>TABLE OF CONTENTS</u></p> <p><u>Scope</u></p> <p><u>References</u></p> <p><u>Definitions</u></p> <p><u>Outline of Requirements</u></p> <p><u>BACKGROUND</u></p> <p><u>IMPACT ON BIODIVERSITY AND THE ENVIRONMENT</u></p> <p><u>GENERAL REQUIREMENTS</u></p>		

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<a href="#">1. Pest risk analysis</a>  <a href="#">1.1 Seeds as pathway</a>  <a href="#">1.2 Purpose of seeds</a>  <a href="#">1.3 Mixing and blending of seeds (section 5.2 of the draft under consultation)</a>  <a href="#">1.4 Pest Risk Management</a>  <a href="#">1.4.1 Seed certification schemes (section 2.1 of the draft under member consultation, including the relevant measures for pest risk Management described in section 2.6 of current draft)</a>  <a href="#">1.4.2 Resistant varieties</a>  <a href="#">1.4.3 Seed treatments (item 2.4 of the draft under consultation including in this item relevant content of Appendix 2, which we suggest to delete)</a>  <a href="#">2. Phytosanitary measures</a>  <a href="#">2.1 Consignment inspection and testing for freedom of a pest,</a>  <a href="#">2.2 Field inspection for freedom of a pest,</a>  <a href="#">2.3 Pest free areas, areas of low pest prevalence, pest free places of production, pest free production sites</a>  <a href="#">2.4 Phytosanitary treatments</a>  <a href="#">2.5 Post entry quarantine</a>  <a href="#">2.6 Prohibition</a>		

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<a href="#">3. Equivalence of phytosanitary measures</a>  <a href="#">4. Specific requirements</a>  <a href="#">4.1 Inspection</a>  <a href="#">4.1.1 Inspection of seeds</a>  <a href="#">4.1.2 Field inspection</a>  <a href="#">4.2 Sampling</a>  <a href="#">4.2.1 Sampling of consignments of small quantity of seeds</a>  <a href="#">4.3 Pest diagnosis</a>  <a href="#">4.3.1 Serological and molecular diagnostic protocols</a>  <a href="#">4.3.2 Treated seeds</a>  <a href="#">4.4 Importation of small seed Consignments</a>  <a href="#">5. Re-export of seeds (section 5 of the draft under consultation)</a>  <a href="#">5.1 General considerations</a>  <a href="#">6. Record keeping</a>  <a href="#">New section 1.3: We suggest to move current section 5.2 "Mixing and blending of seeds" as a sub section under pest risk analysis. Current section 5.2 explains the concepts of these terms and gives some provisions of ISPM 12, but no additional guidance is provided. Therefore we believe that this section should be further developed by the EWG to provide guidance for assessing pest risk of mixing and blending of seeds as requested in task 4 of Specification N° 54.</a>		

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><u>New section 1.4 “pest risk management”: current section 2 of the draft mixes information to be considered in the pest risk management stage of PRA (e.g. seed certification schemes, resistant varieties) with phytosanitary measures to minimize pest risk (e.g PFA, post entry quarantine), so we propose to separate both including a new sub section 1.4 to describe the information to be considered in pest risk management stage of PRA and to include phytosanitary measures in a separate section.</u></p> <p><u>New sub section 1.4.1 “Seed certification schemes”: Include in this subsection current section 2.1 (Seed certification schemes) of the draft as well as the measures relevant for pest risk Management described in current section 2.6 (Measures for seed production).</u></p> <p><u>New sub section 1.4.2 “Resistant varieties”, include in this sub section current section 2.2</u></p> <p><u>New sub section 1.4.3 “Seed treatments”: Include in this new sub section current section 2.4 “treatments and concepts included in current Appendix 2. Delete appendix 2.</u></p> <p><u>Section 2 “Phytosanitary measures”: Task 5 requested the EWG to identify the phytosanitary import requirements most commonly used by NPPOs in relation to seed consignments but they are not identified (e.g free consignment by field testing, or by laboratory testing). In this regard we suggest to include the following phytosanitary measures “consignment inspection and testing for freedom from a pest” and “field inspection for freedom from a pest” as new sections 2.1 and 2.2, respectively.</u></p> <p><u>Section 2.3 “Pest free areas, pest free places of production and pest free production sites”, we suggest to add “areas of low pest prevalence” as another phytosanitary measure.</u></p> <p><u>Section 2.4 Treatments: we suggest to change the title of this section to “phytosanitary treatments” in order to differentiate from seed treatments</u></p> <p><u>9) In section 3 “Equivalence of phytosanitary measures” it is not clear if it refers to a request of the NPPO of the exporting country regarding the measures established in the PRA, or to the application of an equivalent measure by the</u></p>		

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><u>NPPO of the importing country, regarding a non-compliance upon arrival of the seeds. In addition reference to ISPM 24 should be included</u></p> <p><u>10) Section 4.1.1 Inspection of seeds: We suggest to change the term "lot" by "consignment", because import and export inspections are conducted for consignments, which according ISPM 5 may be composed by one or more lots. This change should be made throughout the draft. The majority of seed borne pests are not detected by inspection and utility of visual examination should not be linked with lot size.</u></p> <p><u>11) Section 4.2 "Sampling": According ISPM 5 the term "infestation" includes "infection" therefore only the term infestation should be used at the end of the section</u></p> <p><u>12) Section 4.2.1 "Sampling of small lots": Change title of the section to "sampling of consignments with small quantity of seeds". When referring to other means of sampling, reference to non statistical alternatives of sampling should be mentioned in accordance to ISPM 31, and provide the examples proposed in paragraphs 143 and 144 without giving a specific % in the case of fixed proportion samples.</u></p> <p><u>13) Section 4.2.2 "Sampling of seeds in sealed containers": Delete the entire section because its content seems a commercial issue rather than technical.</u></p> <p><u>14) Section 4.3: "Detection": Change title of section to "Pest diagnosis", glossary term that includes detection and identification. Include reference to Diagnostic Protocols adopted by CPM.</u></p> <p><u>15) Section 4.4 "Importation of small seed lots": Add reference to ISPM 20 because it provides guidance on import permits.</u></p> <p><u>16) Section 5 "Phytosanitary certification" this section does not refer to the entire process of phytosanitary certification, e.g. field inspection, laboratory testing, etc. it refers only to re-export of seeds already harmonized in ISPM 12. Therefore we suggest to change the title to "re-export of seeds". Paragraph 167 is not consistent with ISPM 12, the provision of additional phytosanitary information is based on a voluntary bilateral agreement, under the request of the exporters as it is specifically mentioned in ISPM 12. We also suggest to delete reference to</u></p>		

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			<p><u>equivalence of measures, because there is an entire section on this issue.</u></p> <p><u>17) ANNEX 1: Change it as an appendix for reference purposes. In addition we suggest to change "insects" by "arthropods", because some examples of mites are mentioned in the draft. In addition we suggest to reorder the annex and to move text in paragraphs 197 and 198 under paragraph 182.</u></p> <p><u>Change "insects in the field" (section 1.1) by "pre-harvest" and "Stored product insects" by "post-harvest"</u></p> <p><u>18) Finally, translation into Spanish should be revised. "Movement" should be translated as "movimiento", "management" as "manejo" (throughout the text), "Seed borne pest" as "Plaga transportada por semilla" (paragraph 27); "Processing" as "procesamiento" (paragraph 30), "Potential" as "potencial" (paragraphs 32, 47, 52), "Harvest" as "cosecha" (paragraph 33), "post-harvest" as "poscosecha" (paragraph 33), "Health" as "sanidad" (paragraph 44), "crop" as "cultivo" (paragraph 51), "Field conditions" as "condiciones de campo" (paragraph 53).</u></p>		
13.	G	Technical		The use of the terms "restrictive", "restricted" and "confinement" needs to be clarified."	New Caledonia*
14.	G	Technical	<p><u>1. Use agreed terminology for mentioning phytosanitary import requirements all over the text of the ISPM. Do not use import requirements only, since it's not defined concept</u></p> <p><u>2- To remove paragraphs (77-80)</u></p>	The resistance is not relevant to phytosanitary measures	NEPPO, Bahrain, Morocco
15.	G	Technical	<p><u>In reference to Appendix 2 - General Classification of Seed Treatment- paragraph 261: Some examples of Biological Treatments should be given.</u></p> <p><u>There should be an Annex or Appendix which list examples of seed-borne or seed-transmitted pests.</u></p>	This is necessary in order to provide more guidance to the reader and to make the standard more useful	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
16.	G	Translation	<p><u>Para la elaboración de la Norma es necesario considerar lo siguiente:</u></p> <p><u>• En lo posible las ONPF's deben estandarizar las declaraciones adicionales debido a que algunos países requieren un lenguaje específico y si éste no se</u></p>	See comments	Mexico

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			<p><u>indica exactamente como aparece en el permiso de importación algunas ONPF el embarque es rechazado, sobre la base que el Certificado Fitosanitario Internacional no fue emitido correctamente. Debido a esta falta de armonización es prácticamente imposible que las ONPF's de re-exportación de semilla emitan certificados utilizando información fitosanitaria adicional.</u></p> <p><u>• Las ONP's cambian constantemente los requisitos fitosanitarios, generalmente estos requisitos cambian después de producida la semilla y exportada, lo cual es imposible retroactivamente obtener las nuevas declaraciones adicionales basadas en inspecciones de campo o producción en áreas libres a un determinado patógeno.</u></p> <p><u>• Las ONP's establecen requisitos para plagas en las que la semilla no es vía de transmisión o propagación.</u></p> <p><u>• Numerosos trabajos de investigación sobre enfermedades de las plantas se publican cada año. Los estudios pueden documentar que la transmisión de la enfermedad puede ocurrir por semilla bajo condiciones de laboratorio pero la transmisibilidad no se produce o no se ha estudiado en condiciones de campo.</u></p> <p><u>• Semillas para investigación, desarrollo y comercialización de alto valor genético cada vez más están siendo producidas en ambientes controlados donde las condiciones fitosanitarias son muy estrictas y monitoreadas para reducir o eliminar la presencia de plagas. Estas condiciones controladas por lo general son superiores a los que normalmente se observa en los sistemas tradicionales de cuarentena de entrada.</u></p> <p><u>• La interpretación correcta de los resultados del análisis fitosanitarios de semillas es fundamental. Las pruebas muestran resultados idénticos en los casos en que el patógeno es viable o cuando es inactivo. Pruebas indirectas (técnicas serológicas y de ADN/ARN) detectan ambos estados de los patógenos, en contraste las pruebas directas (growout e hipersensibilidad) solo detectan al patógeno viable. Si el resultado de una prueba indirecta es positivo, entonces se requiere una segunda prueba directa para confirmarlo, si un resultado indirecto es negativo, no se requiere confirmación.</u></p> <p><u>• Varias ONPF's no cuentan con bases de requisitos fitosanitarios de importación públicos para la importación de semillas. Los requisitos fitosanitarios</u></p>		

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			<p><u>son incluidos en los permisos de importación pero el exportador no puede obtener esta información hasta que se obtiene el permiso de importación. Las ONPF's requieren conocer los requisitos con suficiente antelación para que puedan ser evaluadas en las inspecciones de campo y/o en análisis de laboratorio.</u></p> <p><u>• Aún cuando los Certificados Fitosanitarios Internacionales indican en las declaraciones adicionales los requerimientos de acuerdo al permiso de importación, algunas ONPF's realizan muestreo de semilla al 100% de los lotes en proceso de importación, con el objeto de enviar a sus laboratorios una muestra de semilla para diagnóstico fitosanitario. La ONPF podrán establecer medidas alternas para evitar la perforación/violación de envases de semilla cerrados herméticamente.</u></p> <p><u>Specific comments on the proposed standard:</u></p> <p><u>For the Spanish version the following changes are recommended:</u></p> <p><u>Paragraph (31) Changes proposed for better wording.</u></p> <p><u>Además de la circulación con fines comerciales, también es frecuente la circulación internacional de semillas para su uso en investigación. Por tanto, al evaluar el riesgo de plagas y determinar las medidas fitosanitarias oportunas, las ONPF deberían tener en consideración si el material se somete a cuarentena y si no se destina para su distribución en el país importador para ser plantado.</u></p> <p><u>Paragraph (36) Changes proposed for better wording.</u></p> <p><u>Numerosas semillas (incluidas las peletizadas y las recubiertas) circulan a escala internacional para su plantación para producir alimentos y plantas ornamentales, pero también a otros fines (por ejemplo, la producción de biocombustibles y fibras, la forestación, usos farmacológicos o precomerciales, como la investigación y el incremento de semillas).</u></p> <p><u>Paragraph (38) Change proposed for improve the translation.</u></p> <p><u>La circulación internacional de semillas supone para las ONPF retos distintos de</u></p>		



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><u>los que plantea la circulación internacional de otras formas de plantas para plantar. Por ejemplo, las semillas producidas en un país y exportadas a un segundo para su acondicionamiento, prueba y embalaje podrán reexportarse posteriormente a muchos otros destinos...</u></p> <p><u>Paragraph (44) Changes proposed for improve the translation.</u></p> <p><u>La armonización de las directrices fitosanitarias internacionales aplicables a las semillas contribuirá a preservar la biodiversidad y salvaguardar la sanidad de las semillas almacenadas para su uso posterior...</u></p> <p><u>Paragraph (51) Changes proposed for better wording and to improve the translation.</u></p> <p><u>Algunas plagas que no son portadas por semillas podrían asociarse a la transmisión de patógenos después de haber sido plantadas y cosechadas (por ejemplo, esclerocios, semillas de plantas consideradas plagas).</u></p> <p><u>Paragraph (52) Change proposed to improve the translation.</u></p> <p><u>Si se ha llegado a la conclusión de que la semilla examinada puede ser portadora de una posible plaga cuarentenaria, se debería determinar con cuidado si la plaga en cuestión realmente puede considerarse en el área de ARP a fin de...</u></p> <p><u>Paragraph (53) Changes proposed for better wording and to improve the translation.</u></p> <p><u>Numerosos estudios han documentado casos de plagas portadas por semillas que se transmiten bajo condiciones de laboratorio sin que se haya observado esta condiciones de campo, lo que contribuye a la incertidumbre de las condiciones de los ARP sobre las semillas como vías de transmisión.</u></p> <p><u>Paragraph (117) Better wording.</u></p> <p><u>Las ONPF podrán aplicar la cuarentena posentrada a las semillas que se consideran de alto riesgo de introducción de plagas cuarentenarias. En la NIMF</u></p>		

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><u>34:2010 se brinda orientación sobre las estaciones de cuarentena posentrada.</u></p> <p><u>Paragraph (126) Better wording.</u></p> <p><u>En el caso de las semillas, un ejemplo de una medida fitosanitaria equivalente es la sustitución de un requisito de inspección de campo para detectar una plaga objetivo en el país de origen, sustituyendo este por un análisis adecuado de las semillas o un tratamiento eficaz aplicado a las mismas para combatir la plaga objetivo.</u></p>		
17.	1	Translation	<b>Draft ISPM: International movement of seeds (2009-003)</b>	"movement" should be translated into Spanish as "movimiento" or "movilización"	OIRSA
18.	7	Editorial	This standard provides guidance to assist national plant protection organizations (NPPOs) <u>to</u> identify, assess and manage the pest risk associated with the international movement of seeds.	better wording	EPPO, Georgia, European Union, Serbia, Algeria
19.	7	Editorial	This standard provides guidance to assist national plant protection organizations (NPPOs) <u>to</u> identify, assess and manage the pest risk associated with the international movement of seeds.	Grammatical correction	ISF*
20.	7	Editorial	This standard provides guidance to assist national plant protection organizations (NPPOs) <u>to</u> identify, assess and manage the pest risk associated with the international movement of seeds.	Addition of "to" for grammatical correction.	South Africa
21.	7	Technical	This standard provides <u>additional</u> guidance to assist national plant protection organizations (NPPOs) <u>to</u> identify, assess and manage the pest risk associated with the international movement of seeds.	Text modified according to the scope of Specification 54	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
22.	7	Translation	This standard provides guidance to assist national plant protection organizations (NPPOs) identify, assess and manage the pest risk associated with the international movement of seeds.	"manage" should be translated into Spanish as "manejar"	OIRSA
23.	8	Editorial	The standard also provides guidance on (1) <del>criteria for the harmonization of</del> phytosanitary import requirements to facilitate the international movement of seeds; (2) <del>criteria for the harmonization of</del> procedures for re-export of seeds; and (3) inspection and testing of seeds.	More straightforward and better readable	EPPO, Georgia, European Union, Serbia, Algeria
24.	8	Editorial	The standard also provides guidance on <u>criteria for the harmonization of</u> (1) <del>criteria for the harmonization of</del> phytosanitary import requirements to facilitate the international movement of seeds; (2) <u>inspection and testing of seeds</u> <del>criteria for the harmonization of procedures for re-export of seeds; and</del> (3) <del>inspection and testing of seeds.</del> <u>the phytosanitary consideration for re-export of seeds.</u>	We would like to revise this paragraph according to the arrangement of the content in the draft.	Thailand

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25.	8	Editorial	The standard also provides guidance on <del>(4)</del> criteria for the harmonization of phytosanitary import requirements to facilitate the international movement of seeds; <del>(2)</del> criteria for the harmonization of procedures for re-export of seeds; and <del>(3)</del> inspection and testing of seeds.	Remove unnecessary numbering.	Australia
26.	8	Substantive	The standard also provides guidance on (1) criteria for the harmonization of phytosanitary import requirements to facilitate the international movement of seeds; (2) criteria for the harmonization of procedures for re-export of seeds; and (3) inspection and testing of seeds.  <u>As the re-export aspect (point no. 2) is considered important but the current draft does not cover this aspect – propose to add in more details on this in the draft:</u>	The existing draft does not cover the point no. 2 - "Criteria for the harmonisation of procedures for re-export of seeds" - only very briefly mentioned under PC-General consideration. Therefore, due to the importance of this aspect for seed trade, it is recommended that more details be added covering this.	Singapore, China
27.	8	Substantive	The standard also provides guidance on (1) criteria for the harmonization of phytosanitary import requirements to facilitate the international movement of seeds; <del>(2) criteria for the harmonization of procedures for re-export of seeds; and (3) (2)</del> inspection and testing of seeds.	the concept of (2) can be included in (1) and procedure for re-export of seeds could follow ISPM 12.	Korea, Republic of, Ghana, Belize, Lesotho
28.	8	Substantive	The standard also provides guidance on (1) criteria for the harmonization of phytosanitary import requirements to facilitate the international movement of seeds; (2) criteria for the harmonization of procedures for re-export of seeds; and (3) inspection and testing of seeds.	The standard does not provide criteria for harmonisation. More information would be required in the standard to address harmonization.	South Africa
29.	8	Technical	The standard also provides guidance on <del>(1) criteria for the harmonization of phytosanitary import requirements to facilitate the international movement of seeds; (2) criteria for the harmonization of procedures for re-export of seeds; and (3) inspection, sampling and testing of seeds.</del>	Text deleted because is not included in the text of the draft although it is indicated in Specification 54	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
30.	8	Translation	The standard also provides guidance on (1) criteria for the harmonization of phytosanitary import requirements to facilitate the international movement of seeds; (2) criteria for the harmonization of procedures for re-export of seeds; and (3) inspection and testing of seeds.	"guidance" should be translated into Spanish as "directrices"	OIRSA
31.	9	Editorial	This standard applies to seeds <u>(as a commodity class) including in the botanical sense.</u> <del>The standard covers</del> seeds for laboratory testing or destructive analysis, and <del>seeds for</del> planting under restrictive conditions. <del>This standard does not apply to grain.</del> <u>Regulated pests associated with seeds which may be seed-borne, seed transmitted and contaminating pest are considered in this standard.</u>	We would like to propose to revise this paragraph for 3 reasons as follows: 1.The term "seeds (as commodity class)" is more properly to be used in sentence 1. 2.It is not necessary to refer to grain because the definition of "seeds (as commodity class)" is clearly applied. 3. A scope of regulated pest for assessment should be provided as revised herein to completely define the scope.	Thailand
32.	9	Editorial	This standard applies to seed in the botanical sense. The standard <del>includes covers</del> seeds for laboratory testing or destructive analysis, and seeds for planting, <u>including</u> under <u>quarantine</u> <del>restrictive</del> conditions. This standard does not	Includes is a more appropriate term. These are quarantine conditions rather than restrictive conditions.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			apply to grain.		
33.	9	Substantive	This standard applies to seed in the botanical sense. The standard covers seeds for laboratory testing or destructive analysis, and seeds for planting under restrictive conditions. This standard does not apply to grain.	Need to be consistent on the use of "restrictive condition..." and "restricted condition"	New Caledonia*
34.	9	Substantive	This standard applies to seed in the botanical sense. The standard covers seeds for laboratory testing or destructive analysis, and seeds for planting under <del>restrictive conditions</del> <u>specific requirements</u> . This standard does not apply to grain.	Restrictive conditions may be confusing. Specific requirements is phytosanitary standard terminology.	United States of America
35.	9	Substantive	This standard applies to seeds( <u>commodity</u> ) in the botanical sense. The standard <u>also</u> covers seeds <u>including</u> for laboratory testing or destructive analysis, and seeds for planting under <del>restrictive</del> <u>quarantine</u> conditions. This standard does not apply to grain.	for clarity	Korea, Republic of, Ghana, Belize
36.	9	Substantive	La norme s'applique aux semences, au sens botanique du terme. Les semences destinées à des essais de laboratoire ou à des analyses destructives et les semences destinées à être plantées dans des conditions restrictives entrent dans le champ d'application. La norme ne s'applique pas aux grains <u>sans pouvoir germinatif</u> .	Le grain peut se disperser dans la nature et transmettre les mêmes dangers que la semence.	Burundi
37.	9	Substantive	This standard applies to seed in the botanical sense. The standard covers seeds for laboratory testing or destructive analysis, and seeds for planting under restrictive conditions. This standard does not apply to grain.	Request clarity on the word "botanical sense" as it is not defined in ISPM 5: 2013.: Glossary of phytosanitary terms. South Africa request that "botanical sense" be defined in the glossary phytosanitary term as one of scientific terminology of seed. • Furthermore, does seed in "botanical sense" includes any vegetative propagative material of a plant and tubers or not? It is therefore not clear what this term refers to and there are several definitions of seed that exists which may be interpreted differently.	South Africa
38.	9	Technical	This standard applies to seed in the botanical sense. The standard covers seeds for laboratory testing or destructive analysis, and seeds for planting <u>for consumption or processing</u> under restrictive conditions. <del>This standard does not apply to grain.</del>	The standard need to be clarified	New Caledonia*
39.	9	Technical	This standard applies to seeds <u>for planting including samples of such in the botanical sense</u> . <del>The standard covers</del> seeds <u>moved internationally</u> for laboratory testing or destructive analysis, and seeds for planting under restrictive conditions. This standard does not apply to grain.	Improve wording to better cover the scope of this standard, including both seeds for planting and samples of lots of seeds for laboratory testing, although this last category strictly spoken has another intended use, viz. testing and not planting.,	EPPO, Georgia, Norway, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
40.	9	Technical	This standard applies to seed in the botanical sense. The standard <u>also</u> covers seeds <u>used</u> for laboratory testing or destructive analysis, and seeds for planting under <u>contained</u> <del>restrictive</del> conditions. This standard does not apply to grain.	More clarity of the purpose of the draft ISPM	NEPPO, Bahrain, Morocco
41.	9	Technical	This standard applies to seed in the botanical sense. The standard <u>also</u> covers seeds for laboratory testing or destructive analysis, and seeds for planting under restrictive conditions. This standard does not apply to grain.	This clarifies the intent of the first sentence in this paragraph.	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Antigua and Barbuda, Belize
42.	9	Technical	This standard applies to seed in the botanical sense. <u>In addition to seeds for planting,</u> <del>t</del> The standard covers seeds for laboratory testing or destructive analysis, and seeds for planting under restrictive conditions. This standard does not apply to grain.	Clarifies the scope of the standard.	ISF*
43.	9	Technical	This standard applies to seed in the botanical sense. The standard <u>also</u> covers seeds for laboratory testing or destructive analysis, and seeds for planting under restrictive conditions. This standard does not apply to grain.	To clarify. As it is worded it gives the idea that this ISPM only covers seeds for laboratory testing and for planting under restrictive conditions.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
44.	9	Technical	This standard applies to seeds <u>for planting including samples of</u> <del>such in the botanical sense. The standard covers</del> seeds <u>moved internationally</u> for laboratory testing or destructive analysis, <del>and seeds for planting under restrictive conditions.</del> This standard does not apply to grain.	Improve wording to better cover the scope of this standard, including both seeds for planting and samples of lots of seeds for laboratory testing, although this last category strictly spoken has another intended use, viz. testing and not planting.,	European Union
45.	9	Technical	This standard applies to seed <u>as a commodity class</u> <del>in the botanical sense.</del> The standard covers seeds for laboratory testing or destructive analysis, and seeds for planting under restrictive conditions. This standard does not apply to grain.	In line with the new glossary term, this is about seed as a commodity class and removes confusion about what seed is in a botanical sense.	Australia
46.	10	Technical	<b>References</b>  <u>Include ISPM 24; Guidelines for the determination and recognition of equivalence of phytosanitary measures (2005)</u>	Equivalence of Phytosanitary measures occurs in paragraph 124 where it should also be referenced.	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
47.	10	Technical	<b>References</b>  <u>ISPM 1. 2006.</u>	Reference to ISPM 1: 2006 was added because is relevant for this draft.	COSAVE, Brazil, Uruguay, Chile,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<a href="#">Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade. Rome. IPPC, FAO</a>		Peru, Argentina
48.	17	Substantive	<b>ISPM 13.</b> 2001. <i>Guidelines for the notification of non-compliance and emergency action.</i> Rome, IPPC, FAO.  <a href="#">ISPM 14.</a> 2002. <i>The use of integrated measures in a system approach for pest management.</i> Rome, IPPC, FAO.	• Addition of ISPM 14: 2002. The use of integrated measures in a systems approach for pest risk management, reason being that integrated measures in a systems approach, is used by many seed companies in the prevention and/ or hygiene programmes to manage pest risks in seed production.	South Africa
49.	17	Substantive	<del><b>ISPM 13.</b> 2001. <i>Guidelines for the notification of non-compliance and emergency action.</i> Rome, IPPC, FAO.</del>	The only cites of this ISPM in the draft standard does not apply, so it is suggested deletion of references.	OIRSA
50.	17	Technical	<b>ISPM 13.</b> 2001. <i>Guidelines for the notification of non-compliance and emergency action.</i> Rome, IPPC, FAO.  <a href="#">ISPM 14.</a> 2001. <i>The use of integrated measures in a systems approach for pest risk management.</i> Rome, IPPC, FAO.	"Integrated measures in a systems approach" are used by many seed companies in prevention and/or hygiene programmes to manage pest risks in seed production.	ISF*
51.	17	Technical	<del><b>ISPM 13.</b> 2001. <i>Guidelines for the notification of non-compliance and emergency action.</i> Rome, IPPC, FAO.</del>  <a href="#">ISPM 22.</a> 2005. <i>Requirements for the establishment of areas of low pest prevalence.</i> Rome, IPPC, FAO	Reference deleted according comment in paragraph 122 Reference to ISPM 22 added as a consequence of comment in paragraph 82	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
52.	17	Technical	<b>ISPM 13.</b> 2001. <i>Guidelines for the notification of non-compliance and emergency action.</i> Rome, IPPC, FAO.  <a href="#">ISPM 14.</a> 2002. <i>The use of integrated measures in a system approach for pest risk management.</i> Rome, IPPC, FAO.	Add new reference, in lign with introduction of a reference to this ISPM in paragraph [74].	European Union
53.	19	Substantive	<b>ISPM 21.</b> 2004. <i>Pest risk analysis for regulated non-quarantine pests.</i> Rome, IPPC, FAO.  <a href="#">ISPM 22.</a> 2005. <i>Requirements for the establishment of areas of low pest prevalence.</i> Rome, Ippc, FAO.	Addition of ISPM 22. 2005. Requirements for the establishment of areas of low pest prevalence, reason being that this ISPM has been cited in paragraph 82.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
54.	20	Substantive	<p><b>ISPM 23.</b> 2005. <i>Guidelines for inspection.</i> Rome, IPPC, FAO.</p> <p><u><a href="#">ISPM 24. 2005. Guidelines for the determination and recognition of equivalence of phytosanitary measures.</a></u> Rome, IPPC, FAO.</p>	<p>• Addition of ISPM 24. 2005:.. Guidelines for the determination and recognition of equivalence of phytosanitary measures, reason being that the standard provides guidance on the procedure for establishing equivalence of phytosanitary measures.</p>	South Africa
55.	20	Technical	<p><b>ISPM 23.</b> 2005. <i>Guidelines for inspection.</i> Rome, IPPC, FAO.</p> <p><u><a href="#">ISPM 24. 2005. Guidelines for the determination and recognition of equivalence of phytosanitary measures.</a></u> Rome, IPPC, FAO.</p>	In lign with introduction of a reference to this ISPM in paragraph 125.	EPPO, Georgia, European Union, Serbia, Algeria
56.	20	Technical	<p><b>ISPM 23.</b> 2005. <i>Guidelines for inspection.</i> Rome, IPPC, FAO.</p> <p><u><a href="#">ISPM 24. 2011. Guidelines for the determination and recognition of equivalence of phytosanitary measures.</a></u> Rome, IPPC, FAO.</p>	The standard provides guidance on the procedure for establishing equivalence of phytosanitary measures.	ISF*
57.	20	Technical	<p><b>ISPM 23.</b> 2005. <i>Guidelines for inspection.</i> Rome, IPPC, FAO.</p> <p><u><a href="#">ISPM 24. 2005. Guidelines for the determination and recognition of equivalence of phytosanitary measures.</a></u> Rome, IPPC, FAO</p> <p><u><a href="#">ISPM 29:2007. Recognition of pest free areas and areas of low pest prevalence.</a></u> Rome, IPPC, FAO</p>	<p>Reference to ISPM 24:2005 added, as a consequence of comment in paragraph 126</p> <p>Reference to ISPM 29 added as a consequence of comment in paragraph 82</p>	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
58.	24	Substantive	<p><b>ISPM 34.</b> 2010. <i>Design and operation of post-entry quarantine stations for plants.</i> Rome, IPPC, FAO.</p> <p><u><a href="#">ISPM 24. Guidelines for the determination and recognition of equivalence of phytosanitary measures.</a></u> Rome, IPPC, FAO.</p> <p><u><a href="#">ISPM 29. Recognition of pest free areas and areas of low pest prevalence.</a></u> Rome, IPPC, FAO.</p>	Other relevant reference ISPM	OIRSA
59.	26	Substantive	Definitions of phytosanitary terms used in the present standard can be found in ISPM 5 ( <i>Glossary of phytosanitary terms</i> ). In addition to definitions in ISPM 5, in this standard the following definitions apply:	Request that “botanical sense” be defined under paragraph 25 as it is not specified in ISPM 5 of the glossary phytosanitary terms. Reason is to provide clarity on the text used in paragraph 9.	South Africa



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
60.	27	Substantive	<b>Seed-borne pest:</b> A pest that can be found on <u>or with</u> the seed (externally - <u>contamination/infestation of a seed</u> ) or within the seed (internally - <u>infection of the seed</u> ) but may or may not be transmitted to progeny plants resulting in <u>infestation</u> <u>infection</u> .	for the sake of completion accuracy and correct terminology	ISTA*
61.	27	Technical	<b>Seed-borne pest:</b> A pest that can be <u>carried-found</u> on the seeds (externally) or <u>present</u> within the seeds (internally) but may or may not be transmitted to progeny plants resulting in infestation.	Better wording and clarification of seed-borne pests. Moreover, use the plural for seeds for clarity throughout the standard.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
62.	27	Technical	<b>Seed-borne pest:</b> A pest that can be found on the seed (externally) or within the seed (internally) but may or may not be transmitted to <u>adult plant and</u> progeny <u>plants</u> resulting in infestation.	In order to clarify	OIRSA
63.	27	Technical	<b>Seed-borne pest:</b> A pest that can be found on the seed (externally) or within the seed (internally) but may or may not be transmitted to <u>resultant</u> <u>progeny</u> plants <u>causing</u> <u>resulting in</u> infestation.	Progeny plant is the descendant of a mother plant. Progeny of the seed would be the seed from the resultant plant. Here we are talking about the resultant plant from the seed.	Australia
64.	27	Translation	<b>Seed-borne pest:</b> A pest that can be found on the seed (externally) or within the seed (internally) but may or may not be transmitted to progeny plants resulting in infestation.	"seed-borne pest" should be translated into Spanish as "plagas transportadas con la semilla"	OIRSA
65.	28	Substantive	<b>Seed-transmitted pest:</b> A seed-borne pest that can be transmitted via seed to progeny plants resulting in <u>infestation</u> <u>infection</u> .	right term	ISTA*
66.	28	Technical	<b>Seed-transmitted pest:</b> A seed-borne pest that can be transmitted via seeds to progeny plants resulting in infestation.	For clarity and consistency throughout the standard.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
67.	28	Technical	<b>Seed-transmitted pest:</b> A seed-borne pest that can be transmitted via seed to <u>adult plant and</u> progeny <u>plants</u> resulting in infestation.	In order to clarify	OIRSA
68.	28	Technical	<b>Seed-transmitted pest:</b> A seed-borne pest that can be transmitted via seed to <u>resultant</u> <u>progeny</u> plants <u>causing</u> <u>resulting in</u> infestation.	Progeny plant is the descendant plant from a mother plant. Progeny seed would be the descendant seed produced from a resultant plant from the mother seed. Here we are talking about the resultant plant from the seed.	Australia
69.	28	Translation	<b>Seed-transmitted pest:</b> A seed-borne pest that can be transmitted via seed to progeny plants resulting in infestation.	"Seed-transmitted pest" should be translated into Spanish as "plaga transmitida por semilla"	OIRSA
70.	30	Editorial	Under the IPPC definition, "seeds" is a commodity class used for planting, not for consumption or processing. Like plants for planting, seeds may present a serious risk of introducing quarantine pests as seed-transmitted pests will be introduced	Remove "for further growth" and replace "it" with "they" for clarity.	Canada



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			to an environment <del>for further growth</del> where <del>they</del> it may have a high likelihood of establishing and spreading (see ISPM 32:2009).		
71.	30	Editorial	Conformément à la définition de la CIPV, le terme «semences» désigne une catégorie de marchandises destinées à la plantation et non à la consommation ou à la transformation. À l'instar des végétaux destinés à la plantation, les semences peuvent présenter un risque sérieux d'introduction d'organismes nuisibles de quarantaine puisque les organismes nuisibles transmis par les semences seront introduits dans un environnement de croissance où il est très probable qu'ils pourront s'établir et se disséminer (voir la NIMP 32:2009).	Plus de clarté	Burundi
72.	30	Editorial	Under the IPPC definition, "seeds" is a commodity class used for planting, not for consumption or processing. Like plants for planting, seeds may present a serious risk of introducing quarantine pests as seed-transmitted pests will be introduced to an environment for further growth where it may have a high likelihood of <del>introduction</del> establishing and spreading (see ISPM 32:2009).	Consistency with paragraph [32] 1st sentence	Australia
73.	30	Substantive	Under the IPPC definition, "seeds" is a commodity class used for planting, not for consumption or processing <del>for food, feed, biofuel and other uses</del> . Like plants for planting, seeds may present a serious risk of introducing <del>regulated quarantine</del> pests as seed-transmitted pests will be introduced to an environment for further growth where it may have a high likelihood of establishing and spreading (see ISPM 32:2009).	• Addition of "for food, feed, biofuel and other use" reason being that processing in terms of seed production industry refers to cleaning and conditioning of the seeds. • Replacement of the word "quarantine" with "regulated". The terminology as defined in ISPM 5. 2013. Glossary of phytosanitary terms. includes both quarantine and regulated non-quarantine pests.	South Africa
74.	30	Substantive	<del>Under the IPPC definition, "seeds" is a commodity class used for planting, not for consumption or processing. Like plants for planting, seeds may present a serious risk of introducing quarantine pests as seed-transmitted pests will be introduced to an environment for further growth where it may have a high likelihood of establishing and spreading (see ISPM 32:2009).</del>	The term "seeds" is not defined in the IPPC, but in ISPM 5. ISPM 32 is only cited here and not furthermore.	OIRSA
75.	30	Technical	<del>Seeds, as for other</del> Under the IPPC definition, "seeds" is a commodity class used for planting, not for consumption or processing. Like plants for planting, seeds may present a serious <del>pest</del> risk of introducing quarantine pests as seed-transmitted pests will be <del>because seeds are</del> introduced to an environment <del>for further growth</del> where <del>the pests</del> it may have a high likelihood of establishing and spreading ( <del>see ISPM 32:2009</del> ).	This wording is better suited to the scope of pests on seeds than the extensive wording with references.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
76.	30	Technical	Under the IPPC definition, "seeds" is a commodity class used for planting, not for consumption or processing <del>for food, feed, biofuel and other uses</del> . Like plants for planting, seeds may present a serious risk of introducing quarantine pests as seed-transmitted pests <del>will</del> <del>may</del> be introduced to an environment for further growth where it may have a high likelihood of establishing and spreading (see ISPM 32:2009).	1. (new text added in first sentence) The use of the word 'processing' is confusing in this ISPM as in the terminology of the seed industry it mainly refers to cleaning and conditioning of seeds. Hence the addition of "for food, feed, biofuel and other uses" to the text. 2. (replacement of word in last sentence) Seeds "may" present a risk, "may"	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				be introduced and "may" have a high likelihood of establishing and spreading.	
77.	30	Technical	Under the IPPC definition, "seeds" is a commodity class used for planting, not for consumption or processing. Like <u>propagative plant material</u> <del>plants for planting</del> , seeds may present a <del>serious</del> <u>higher</u> risk of introducing <u>and spreading</u> quarantine pests <u>than other commodities because as</u> seed-transmitted pests <del>will be introduced to an environment for further growth where it</del> may have a high likelihood of establishing and spreading (see ISPM 32:2009).	"Plants for planting" was replaced for propagative plant material because plants for planting include seeds (ISPM 5). "Serious" was replaced and paragraph reworded for consistency with ISPM 32	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
78.	30	Translation	Conformément à la définition de la CIPV, le terme «semences» désigne une catégorie de marchandises destinées à la plantation et non à la consommation ou à la transformation. À l'instar des végétaux destinés <u>au semis à la plantation</u> , les semences peuvent présenter un risque sérieux d'introduction d'organismes de quarantaine puisque les organismes nuisibles transmis par les semences seront introduits dans un environnement de croissance où il est très probable qu'ils pourront s'établir et se disséminer (voir la NIMP 32:2009).	les graines sont semées. problème de traduction	Gabon
79.	31	Editorial	<del>As well as movement for commercial trade, s</del> Seeds are also regularly moved internationally for research purposes. <del>Therefore, W</del> when assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should <del>therefore</del> consider whether the material <u>will be</u> treated in quarantine <u>or and whether it is not for</u> released <u>d</u> for planting in the <u>environment in the</u> importing country.	For clarity. Regarding last sentence, this is typical phrasing when using the term "releasing"	United States of America
80.	31	Substantive	As well as movement for commercial trade, seeds are also regularly moved internationally for research purposes. When assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should therefore consider whether the <u>seed material</u> is treated in <u>post entry</u> quarantine and whether it is <del>not</del> for release for planting in the importing country.	1. In the second sentence, replace "material" with "seed" and add "post entry" for clarity in identifying what and where it is being treated. Also remove the word "not" for clarity.	Canada
81.	31	Substantive	As well as movement for commercial trade, seeds are also regularly moved internationally for research purposes. When assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should therefore consider whether the material <u>maintained under</u> <del>is treated</del> in quarantine <u>conditions or</u> <del>and</del> whether it is <u>intended</u> <del>not</del> for release for planting in the importing country.	Replacement of "treated in" with "maintained under" for contextual clarification. • Deletion of "and" reason being that quarantine and release for planting should be considered independently; hence the addition of "conditions or" and "intended". Deletion of 'not' for contextual clarification.	South Africa
82.	31	Substantive	<del>As well as movement for commercial trade, seeds are also regularly moved internationally for research purposes. When assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should therefore consider whether the material is treated in quarantine and whether it is not for release for planting in the importing country.</del>	This is a specification that only appears in the outline of requirements. The outline of requirements is a summary of the standard, so it can not contain specifications.	OIRSA
83.	31	Technical	As well as movement for commercial trade, seeds are also regularly moved internationally for research purposes. When assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should therefore	Clearer wording, expressing the intention better	EPPO, Georgia, European Union,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			consider whether <u>in the importing country</u> the material is <u>intended to be used</u> <del>treated</del> in quarantine <u>or to be</u> <del>and whether it is not for</del> released <u>for planting in the importing country.</u>		Norway, Serbia, Algeria
84.	31	Technical	As well as movement for commercial trade, seeds are also regularly moved internationally for research purposes. When assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should therefore consider whether the material is <u>maintained</u> <del>treated</del> in quarantine <u>conditions or</u> <del>and</del> whether it is <u>intended</u> <del>not</del> for release for planting in the importing country.	The use of the word 'treated' is confusing. Quarantine and release for planting should be considered independently; so it is not 'and' but 'or'.	ISF*
85.	31	Technical	As well as movement for commercial trade, seeds are also regularly moved internationally for research purposes. When assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should therefore consider whether the <del>material</del> <u>seeds may be authorized</u> <del>is treated in quarantine and whether it is not for release for</del> <u>field planting</u> planting in the importing country <u>or under post entry quarantine conditions.</u>	"Material" was replaced by "seeds" for consistency. "Release was replaced by "authorized", and "treated in quarantine" by "under post-entry quarantine" because this para. refers to seeds for research purposes	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
86.	32	Editorial	A pest risk analysis (PRA) should determine if the seed is a pathway for the introduction and spread of regulated pests and may lead to establishment of regulated pests in the PRA area. The PRA should consider the relationship between the intended use of the seeds (e.g. planting, research, testing) and the potential for pests to <u>become</u> established.	editorial correction	ISF*
87.	32	Substantive	A pest risk analysis (PRA) should determine if the seed is a pathway for the introduction and spread of regulated pests and may lead to establishment of regulated pests in the PRA area. The PRA should consider the relationship between the intended use of the seeds (e.g. planting, research, testing) and the potential for pests to <u>introduction</u> <del>establish.</del>	Purpose export seed to do related to the potential for pest to introduction	Viet Nam
88.	32	Substantive	A pest risk analysis (PRA) should determine if the seed is a pathway for the introduction and spread of regulated pests <del>and may lead to establishment of regulated pests</del> in the PRA area. The PRA should consider the relationship between the intended use of the seeds (e.g. planting, research, testing) and the potential for pests to establish.	This is to remove redundancy since the definition for 'introduction' means entry and establishment of a pest.	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
89.	32	Substantive	A pest risk analysis (PRA) should determine if the seed is a pathway for the introduction, <u>establishment</u> and spread of regulated pests <del>and may lead to establishment of regulated pests in the PRA area.</del> The PRA should consider the relationship between the intended use of the seeds (e.g. planting, research, testing) and the potential for pests to establish <u>and spread.</u>	• Addition of the word "establishment" for contextual clarification and emphasis on pest risk analysis fundamental principles. • Deletion of the sentence: "and may lead to establishment of regulated pests in the PRA area" for more correct	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				wording. • Addition of “and spread” for contextual clarification and emphasis on pest risk analysis fundamental principles. .	
90.	32	Technical	A pest risk analysis (PRA) should <u>be used to</u> determine if the seeds <u>are</u> <del>is</del> a pathway for the <del>entry</del> introduction and spread of <del>quarantine</del> regulated pests <del>which</del> <del>and</del> may lead to establishment of <del>quarantine</del> regulated pests in the PRA area. The PRA should consider the relationship between the intended use of the seeds (e.g. planting, research, testing) and the potential for <u>quarantine</u> pests to establish <u>or RNQPs to cause economically unacceptable impact</u> .	Better wording and clearly distinguishing between Q pests and RNQP that both can be transmitted by seeds.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
91.	32	Technical	A pest risk analysis (PRA) should determine if the seed is a pathway for the introduction and spread of regulated pests <del>and may lead to establishment of regulated pests</del> in the PRA area. The PRA should consider the relationship between the <del>intended use</del> <u>the purpose for which</u> of the seeds <u>are imported</u> (e.g. <u>field</u> planting, research, testing) and the potential for pests to establish.	Introduction includes entry and establishment. Intended use of seeds is planting. Examples between brackets are purposes for which seeds are imported.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
92.	32	Technical	A pest risk analysis (PRA) should determine if the seed is a pathway for the introduction and spread of regulated pests <del>and may lead to establishment of regulated pests</del> in the PRA area. The PRA should consider the <del>relationship between the intended</del> use of the seeds (e.g. <del>planting</del> , research, testing) and the potential for pests to establish.	This is already part of the definition of introduction under ISPM 5. The glossary definition for seed is for planting. These are uses rather than intended uses under ISPM 32-Categorisation of commodities according to their pest risk.	Australia
93.	33	Editorial	This standard identifies and describes specific phytosanitary measures that may be used to reduce the pest risk associated with the international movement of seeds, including phytosanitary measures that may be applied before planting, throughout growth, at seed harvest, post-harvest, during seed processing and on arrival in the <u>importing</u> country <del>of import</del> . The standard recognizes the importance of applying equivalent phytosanitary measures as an option to meet import requirements.	Better wording.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
94.	33	Substantive	This standard identifies and describes specific phytosanitary measures that may be used to reduce the pest risk associated with the international movement of seeds, including phytosanitary measures that may be applied before planting, throughout growth, at seed harvest, post-harvest, during seed processing and on arrival in the country of import. <u>Phytosanitary measures may be used, either singly or in combination, to ensure t he pest risk is adequately managed.</u> The standard recognizes the importance of applying equivalent phytosanitary measures as an option to meet import requirements.	We would like to propose to add a new sentence to demonstrate that the phytosanitary measure can be implemented alone or in combination as follows: Phytosanitary measures may be used, either singly or in combination, to ensure the pest risk is adequately managed.	Thailand
95.	33	Substantive	This standard identifies and describes specific phytosanitary measures that may be used to reduce the pest risk associated with the international movement of seeds, including phytosanitary measures that may be applied before planting, throughout growth, at seed harvest, post-harvest, during seed processing and on arrival in the country of import. The standard recognizes the importance of	To mention other issues of interest covered by the standard	OIRSA

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			applying equivalent phytosanitary measures as an option to meet import requirements.  <u>This standard provides guidance on inspection, sampling, testing and phytosanitary certification of seed.</u>		
96.	33	Technical	<del>This standard identifies and describes S</del> specific phytosanitary measures that may be used to reduce the pest risk associated with the international movement of seeds, including <del>those phytosanitary measures</del> that may be applied before planting, <del>during</del> throughout growth, at seed harvest, post-harvest, during seed processing and on arrival in the country of import. <del>The standard recognizes the importance of applying e</del> Equivalent phytosanitary measures <u>may be applied as an option</u> to meet <u>phytosanitary</u> import requirements.	To clarify the text and use better wording.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
97.	33	Technical	This standard identifies and describes specific phytosanitary measures that may be used to reduce the pest risk associated with the international movement of seeds, including phytosanitary measures that may be applied before planting, throughout growth, at seed harvest, post-harvest, during seed processing, <u>storage, transportation</u> and on arrival in the country of import. The standard recognizes the importance of applying equivalent phytosanitary measures as an option to meet import requirements.	For consistency with Section 2.6.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
98.	34	Substantive	<del>NPPOs may establish specific requirements for the importation of small seed lots.</del>	Establishment of import requirements is the responsibility of NPPO of importing country depending on the risk & hence there is no need to have this sentence for NPPO to do similar for small seed lots.	Singapore
99.	34	Substantive	<del>NPPOs may establish specific requirements for the importation of small seed lots.</del>	There is no quarantine basis for NPPOs to establish this.	China, Thailand, Korea, Republic of, Ghana, Belize
100.	34	Substantive	NPPOs may establish <u>and implement</u> specific requirements for the importation of small seed lots.	Addition of "and implement" to provide greater clarity and focus.	South Africa
101.	34	Substantive	<del>NPPOs may establish specific requirements for the importation of small seed lots.</del>	The deletion of same text was suggested on the body of the draft standard. Furthermore, there is no quarantine basis for NPPOs to establish this.	OIRSA
102.	34	Substantive	<del>NPPOs may establish specific requirements for the importation of small seed lots.</del>	There is no quarantine basis for suggesting NPPO's may establish specific requirements for the importation of small seed lots.	Australia
103.	34	Technical	<del>NPPOs may establish specific requirements for the importation of small seed lots.</del>	NPPO has the authority to establish requirement for any size of lots.	New Caledonia*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
104.	34	Technical	<del>NPPOs may establish specific requirements for the importation of small seed lots.</del>	This minor element need not be in the outline	EPPO, Georgia, Serbia
105.	34	Technical	NPPOs may establish specific requirements for the importation of small seed lots <u>either through the use of special import permits or other explicit documentation.</u>	In the earliest stages of R&D seed quantities are very small, often only a few hundreds or thousands of individual seeds. The export certification system for large quantities of seed is not always appropriate for such small quantities of seed. Special import permits or other documentation, such as a letter from the authorities, allowing entry of such seed along with elements of traditional phytosanitary certification would work better.	ISF*
106.	34	Technical	NPPOs may establish specific requirements for the importation of small seed <del>lots</del> <u>consignments</u> .	"Lot" was replaced by "consignment" because phytosanitary requirements are related to consignments. A consignment may consist of one or more lots	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
107.	34	Technical	<del>NPPOs may establish specific requirements for the importation of small seed lots.</del>	This secondary element need not be in the outline.	European Union
108.	36	Editorial	Many seeds (including pelleted and coated seeds) are moved internationally <u>for the production to be planted, primarily for of or for example biomass food and ornamental plant production but also for a number of other purposes (e.g. production of, biofuels and, fibre, forestry, pharmacological and ornamental plants or for uses, pre-commercial uses (research, seed multiplication increase)).</u>	Simplification, better wording and better readability	EPPO, Georgia, Serbia, Algeria
109.	36	Editorial	<u>Seeds are moved internationally for many purposes.</u> Many seeds (including pelleted and coated seeds) <del>are moved internationally to be planted, primarily planted</del> for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed increase)).	To convey that we are contrasting the idea that there are plants for planting, and then other purposes	United States of America
110.	36	Editorial	Many seeds (including pelleted and coated seeds) are moved internationally <u>for the production to be planted, primarily for of or for example biomass food and ornamental plant production but also for a number of other purposes (e.g. production of, biofuels and, fibre, forestry, pharmacological and ornamental plants or for uses, pre-commercial uses (research, seed multiplication increase)).</u>	Simplification, better wording and better readability	European Union
111.	36	Editorial	Many seeds (including pelleted and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed <u>increase and multiplication</u> )).	To ensure consistency with paragraphs [37] and [56].	Japan



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
112.	36	Substantive	Many seeds (including pelleted, <u>treated</u> and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed <u>multiplication and increase</u> )).	Addition of the word "treated", for contextual clarification. Addition of "multiplication and" reason being that increase is ambiguous and does not cover what is intended in this paragraph.	South Africa
113.	36	Technical	Many seeds (including pelleted and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed <u>increase multiplication</u> )).	The term "multiplication" is more suited.	New Caledonia*
114.	36	Technical	Many seeds (including pelleted and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed <u>increase multiplication</u> )).	"Multiplication" is a more appropriate word to use instead of "increase" .	Singapore
115.	36	Technical	Many seeds (including pelleted and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed <u>increase multiplication</u> )).	Use of a better term for more clarity.	China, Thailand, Korea, Republic of, Ghana, Belize, Lesotho
116.	36	Technical	Many seeds (including pelleted and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed increase)).  <u>Under the IPPC ISPM 5 definition, seeds is a commodity class used for seeds for planting, not for consumption or processing, e.g. for food and feed.</u>  <u>As other plants for planting, seeds may present a serious risk because seeds are introduced to an environment where the pests may have a high likelihood of establishing and spreading (see ISPM32:2009).</u>	Add text here that is removed from scope, because it better fits in the background than in the scope.	EPPO, Georgia, Serbia, Algeria
117.	36	Technical	Many seeds (including <u>treated</u> , pelleted and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed <u>multiplication increase</u> )).	1. Treated seed are increasingly moved internationally. 2. The word 'increase' is ambiguous and does not fully cover what is intended in this paragraph. The term 'multiplication' is understood the world over.	ISF*
118.	36	Technical	Many seeds ( <del>including pelleted and coated seeds</del> ) are moved internationally to be planted, primarily for food and ornamental plant production but also for a	Add text here that is removed from scope, because it better fits in the background than in the	European Union

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p>number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed increase)).</p> <p><u>Under the IPPC ISPM 5 definition, seeds is a commodity class used for seeds for planting, not for consumption or processing, e.g. for food and feed.</u></p> <p><u>As other plants for planting, seeds may present a serious risk because seeds are introduced to an environment where the pests may have a high likelihood of establishing and spreading (see ISPM32:2009).</u></p>	scope.	
119.	36	Technical	<p>Many seeds (including pelleted and coated seeds) are moved internationally to be planted, primarily for food and ornamental plant production but also for a number of other purposes (e.g. production of biofuels and fibre, forestation, pharmacological uses, pre-commercial uses (research, seed increase)).</p> <p><u>Under the ISPM 5 definition, seeds is a commodity class used for seeds for planting, not for consumption or processing, e.g. for food and feed.</u></p> <p><u>As other plants for planting, seeds may present a serious risk because seeds are introduced to an environment where the pests may have a high likelihood of establishing and spreading (see ISPM32:2009).</u></p>	Add text here that is removed from Outline of requirements because it better fits in Background .	Norway
120.	37	Editorial	Seed companies commonly have breeding and multiplication programmes in many countries, and distribute <del>these</del> seeds <u>form these</u> to <del>many</del> <u>multiple more</u> countries. The international movement of seeds may involve small quantities (e.g. for breeding and selection) or large quantities (after multiplication).	Better English	EPPO, Georgia, European Union, Serbia, Algeria
121.	37	Editorial	Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small <del>quantities (e.g. for breeding and selection)</del> or large quantities <del>(after multiplication)</del> .	Large quantities can be used for multiplication and for commercialization. This para. is to indicate that both small and large quantities of seed are moved internationally. The reason why quantities are small or large is not relevant	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
122.	37	Editorial	Seed companies <del>may commonly</del> have breeding and multiplication programmes in <del>several</del> <u>many</u> countries, and distribute these seeds to <del>various</del> <u>many more</u> countries. The international movement of seeds may involve small <del>quantities (e.g. for breeding and selection)</del> or large quantities <del>(after multiplication)</del> .	Addition of "may, several and various" for editorial and correct wording. Deletion of "quantities and e.g. for breeding and selection" and "after multiplication" reason being large quantities can be used for multiplication and for commercialization.	South Africa
123.	37	Substantive	<del>Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small quantities (e.g. for breeding</del>	Not relevant. The intent of background in the standard is not to educate on the issues & hence the content under background should be kept	Singapore



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>and selection) or large quantities (after multiplication).</del>	precise and as required,	
124.	37	Substantive	<del>Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small quantities (e.g. for breeding and selection) or large quantities (after multiplication).</del>	Not relevant. The intent of background in the standard is not to educate on the issues.	China, Thailand, Korea, Republic of, Ghana, Belize
125.	37	Substantive	<del>Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small quantities (e.g. for breeding and selection) or large quantities (after multiplication).</del>	Not relevant and partly covered in paragraph [38]	Australia
126.	37	Technical	<del>Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small quantities (e.g. for breeding and selection) or large quantities (after multiplication).</del>	This phrase does not add to the content of the standard.	New Caledonia*
127.	37	Technical	Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small quantities (e.g. for breeding and selection) or large quantities (e.g. for commercialisation after multiplication).	For small quantities the intended use of this small quantity is indicated between brackets. therefore it is better to have this also indicated for large quantities.	EPPO, Georgia, European Union, Serbia, Algeria
128.	37	Technical	Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small quantities (e.g. for breeding and selection) or large quantities (after multiplication).	Large quantities can be used for multiplication and for commercialization. The purpose of this article is to indicate that both small and large quantities of seed are moved internationally. The reason why quantities are small or large is irrelevant.	ISF*
129.	37	Technical	Seed companies commonly have breeding and multiplication programmes in many countries, and distribute these seeds to many more countries. The international movement of seeds may involve small quantities (e.g. for research, breeding and selection) or large quantities (after multiplication).	For better specification of the example	OIRSA
130.	38	Editorial	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other types/forms of plants for planting. For example, seeds produced in one country and exported to a second country for processing, testing and packing may then be re-exported to numerous other destinations over an extended period of time. At the time of production of the seeds, the destination country and its phytosanitary import requirements may not be known, especially if there is a time lag/number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary challenges/issues, including:	More distinct wording and following ISPM 36 terminology (type)	EPPO, Georgia, European Union, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
131.	38	Editorial	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second country for processing, testing and packing may then be re-exported to numerous other destinations over an extended period of time. At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds <u>are</u> <del>is</del> conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including:	'is' should be replaced by 'are' in the second to last sentence in order to be grammatically correct.	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
132.	38	Editorial	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second country for processing, testing and packing may then be re-exported to numerous other destinations over an extended period of time. At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary <u>challenges</u> <del>issues</del> , including:	Replace "issues" with "challenges" for clarity.	Canada
133.	38	Editorial	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second country for processing, testing and packing may then be re-exported to numerous other destinations over an extended period of time. At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including:  <u>As a result, seeds moved internationally may be subject to various phytosanitary issues, including:</u>	Last senetence should be another Paragraph because it is a conclusion of previous Paragraphs.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
134.	38	Editorial	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second	Concept of time in the next sentence. Delete here.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			country for processing, testing and packing may then be re-exported to numerous other destinations <del>over an extended period of time</del> . At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including:		
135.	38	Technical	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second country for <del>processing</del> , <del>processing</del> , testing and packing may then be re-exported to numerous other destinations over an extended period of time. At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including:	Need clarification on the word "processing".	New Caledonia*
136.	38	Technical	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second country for <u>seed processing (or screening, possibly seed treatment and coating etc)</u> , <del>processing</del> , testing and packing may then be re-exported to numerous other destinations <u>including country of origin</u> over an extended period of time. At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including:	To elaborate on "processing" for more clarity. Also, seeds may be re-exported back to the country of origin.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
137.	38	Technical	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second country for processing, testing and packing may then be re-exported to numerous other destinations over an extended period of time. At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and	Use of term phytosanitary issues is confusing	NEPPO, Bahrain, Morocco

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including: <a href="#">Use</a>  <a href="#">More clarification on the meaning of term phytosanitary issues required</a>		
138.	<a href="#">38</a>	Technical	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other <del>forms</del> of plants for planting. For example, seeds produced in one country and exported to a second country for processing, testing and packing may then be re-exported to numerous other destinations over an extended period of time. At the time of production of the seeds, the destination country and its <a href="#">phytosanitary</a> import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including:	"Forms" was deleted for better reading. Term "phytosanitary" added to be consistent with ISPM 5 Term "phytosanitary" added to be consistent with ISPM 5.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
139.	<a href="#">38</a>	Technical	NPPOs face challenges associated with the international movement of seeds that are distinct from the international movement of other forms of plants for planting. For example, seeds produced in one country and exported to a second country for processing ( <a href="#">seed screening, treatment, coating etc</a> ), testing and packing may then be re-exported to numerous other destinations ( <a href="#">including country of origin</a> ) over an extended period of time. At the time of production of the seeds, the destination country and its import requirements may not be known, especially if there are a number of years between production and export to the final destination. Moreover, breeding, selection and evaluation of seeds is conducted internationally to develop new varieties that are adapted to a range of environments and conditions. As a result, seeds moved internationally may be subject to various phytosanitary issues, including:	Processing needs to be clarified here to mean preparing seed rather than processing in an ISPM 32 sense. Seed may also be sent back to the country of origin.	Australia
140.	<a href="#">39</a>	Editorial	- movement of seeds into and out of many countries, for which phytosanitary import requirements and diagnostic and inspection methodologies vary	move this phrase up to the end of paragraph 38	New Caledonia*
141.	<a href="#">39</a>	Editorial	- movement of seeds into and out of <del>various</del> <a href="#">many</a> countries, for which phytosanitary import requirements and diagnostic and inspection methodologies vary	Replacement of "many" with "various" for editorial and correct wording.	South Africa
142.	<a href="#">39</a>	Substantive	<del>movement of seeds into and out of many countries, for which phytosanitary import requirements and diagnostic and inspection methodologies vary</del>	redundant with above paragraph	Thailand

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
143.	40	Editorial	- <del>contradictory phytosanitary measures, unnecessary measures and measures that cannot be fulfilled retrospectively</del> (e.g. field inspections).	The deleted parts are not specific to seed	United States of America
144.	40	Editorial	- contradictory phytosanitary measures, unnecessary measures and measures that cannot be fulfilled <del>retroactively</del> <del>retrospectively</del> (e.g. field inspections).	Replace "retrospectively" with "retroactively" for clarity.	Canada
145.	40	Editorial	- <del>contradictory p</del> Phytosanitary measures, <del>unnecessary measures and measures that cannot be fulfilled retrospectively</del> (e.g. field inspections).  <u>Harmonized international phytosanitary guidance for seeds will help preserve bio diversity and safeguard the health of stored seeds for future use (e.g. seed bank s). The standard will help in the movement and exchange of seeds.</u>	Deletion of the words "contradictory", "unnecessary measures and measures" and "retrospectively", for contextual clarification and use of proper terminology. Addition of the paragraph reason being that the cited paragraph is seen to be more relevant to the background of this standard.	South Africa
146.	40	Substantive	<del>-contradictory phytosanitary measures, unnecessary measures and measures that cannot be fulfilled retrospectively (e.g. field inspections).</del>	Opinions should not be included under background.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
147.	40	Substantive	- contradictory phytosanitary measures, <del>unnecessary measures</del> and measures that cannot be fulfilled retrospectively (e.g. field inspections).	Delete "unnecessary measures", as this is subjective and not necessary.	Canada
148.	40	Substantive	- contradictory phytosanitary measures, unnecessary measures and measures that cannot be fulfilled retrospectively <del>(e.g. field inspections)</del> .	Field inspection for parent plants is conducted by many countries as one of the effective, common inspection methods. To avoid being misleading "(e.g. field inspection)" should be deleted.	Japan
149.	40	Substantive	<del>-contradictory phytosanitary measures, unnecessary measures and measures that cannot be fulfilled retrospectively (e.g. field inspections).</del>	This is an opinion and not appropriate in a standard.	Australia
150.	40	Technical	<del>-contradictory phytosanitary measures, unnecessary measures and measures that cannot be fulfilled retrospectively (e.g. field inspections).</del>	The phrase is impolite and unnecessary	New Caledonia*
151.	40	Technical	- contradictory phytosanitary measures, <del>unjustified</del> <del>unnecessary</del> measures and measures that cannot be fulfilled retrospectively (e.g. field inspections).	Prevention of unjustified measures is a core part of many ISPMs and this is therefore a more appropriate word to use (unnecessary measures are unjustified)	EPPO, Georgia, European Union, Serbia, Algeria
152.	40	Technical	<del>-contradictory phytosanitary measures, unnecessary measures and measures that cannot be fulfilled retrospectively (e.g. field inspections).</del>	No technical justification for this affirmation	NEPPO, Bahrain,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Morocco
153.	40	Technical	- contradictory phytosanitary measures, <del>unnecessary</del> measures <u>that are technically unjustified</u> and measures that cannot be fulfilled retrospectively (e.g. field inspections).	The term “unnecessary” does not explain the phytosanitary nature of the issue for seeds moving internationally.	ISF*
154.	41	Editorial	This standard should help minimize the <u>introduction and spread of pests associated with seeds</u> <del>risk of the global spread of pests</del> , including <u>introduction and spread of</u> <del>those that can be considered</del> plants as pests, and other organisms whose pest risk has not been identified yet.	Better and clearer wording	EPPO, Georgia, Serbia, Algeria
155.	41	Editorial	This standard should help minimize the risk of the global spread of pests, including those that can be considered plants as pests, and other organisms whose pest risk has not <u>yet</u> been identified <del>yet</del> .	For grammatical correctness the sentence should not end with the word 'yet'	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
156.	41	Editorial	This standard should help minimize the risk of the global spread of pests, including <del>these plants</del> that can be considered <del>plants</del> as pests, and other organisms whose pest risk has not been identified yet.	ISPM 5 only has a definition for Pests (Any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products). The concept of plants as pests (e.g. Striga, Cuscuta) may not be clear and would need to be explained in the section Definitions [25] of this standard. See also the use of the term “plants as pests” in [123].	ISF*
157.	41	Editorial	This standard should help minimize the <u>introduction and spread of pests associated with seeds</u> <del>risk of the global spread of pests</del> , including <u>the introduction and spread of</u> <del>those that can be considered</del> plants as pests, and other organisms whose pest risk has not been identified yet.	Better and clearer wording	European Union
158.	41	Substantive	<del>This standard should help minimize the risk of the global spread of pests, including those that can be considered plants as pests, and other organisms whose pest risk has not been identified yet.</del>	Redundant. The basis for IPPC should not be repeated in every standard.	Singapore
159.	41	Substantive	<del>This standard should help minimize the risk of the global spread of pests, including those that can be considered plants as pests, and other organisms whose pest risk has not been identified yet.</del>	Redundant.	China, Korea, Republic of, Ghana, Belize
160.	41	Substantive	This standard should help minimize the risk of the global spread of pests, including those that can be considered plants as pests, <del>and other organisms</del>	ISPMs pursue the harmonization of phytosanitary measures against regulated pests, and should	EPPO, Georgia, European Union,



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>whose pest risk has not been identified yet.</del>	therefore not use general wording as 'other organisms, not yet identified'	Serbia, Algeria
161.	41	Substantive	This standard should help minimize the risk of the global spread of pests, <del>including those that can be considered plants as pests, and other organisms whose pest risk has not been identified yet.</del>	Covered in Annex 4 of ISPM 11.	United States of America
162.	41	Substantive	This standard should help minimize the risk of the global spread of pests, including those that can be considered plants as pests, and other organisms whose pest risk has not been identified yet.	This statement is not correct and not necessary. Dont need to state what the standard should do. Won't help with pests with a risk that has not been identified yet.	Australia
163.	41	Technical	<del>This standard should help minimize the risk of the global spread of pests, including those that can be considered plants as pests, and other organisms whose pest risk has not been identified yet.</del>	this paragraph is not necessary	New Caledonia*
164.	43	Technical	This standard <del>may</del> will help manage the pest risks posed by seeds moved internationally, including those pest risks that can be posed by invasive alien species (as defined in the Convention on Biological Diversity).	To express the intent rather than concluding on the unknown effect of the ISPM.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
165.	44	Substantive	Harmonized international phytosanitary guidance for seeds will help preserve biodiversity and safeguard the health of stored seeds for future use (e.g. seed banks). <del>The standard will help in the movement and exchange of seeds.</del>	Not related to biodiversity. The concept is covered in the first paragraph.	United States of America
166.	44	Substantive	<del>Harmonized international phytosanitary guidance for seeds will help preserve biodiversity and safeguard the health of stored seeds for future use (e.g. seed banks). The standard will help in the movement and exchange of seeds.</del>	Deletion of this paragraph and move it to the background, reason being that this paragraph will be more relevant to the background of this standard.	South Africa
167.	44	Technical	Harmonized international phytosanitary guidance for seeds will help preserve biodiversity and safeguard the health of stored seeds for future use (e.g. seed banks). <del>The standard will help in the movement and exchange of seeds.</del>	the phrase is not necessary	New Caledonia*
168.	44	Technical	Harmonized international phytosanitary <del>measures</del> guidance for seeds <del>may</del> will help preserve biodiversity and safeguard the health of stored seeds for future use (e.g. <del>through exchanges between seed banks</del> seed banks). The standard will help in the movement and exchange of seeds.	ISPMs provide harmonization not guidance. 'May' is more appropriate than 'will'	EPPO, Georgia, European Union, Norway, Serbia, Algeria
169.	47	Editorial	PRAs for seeds should be performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds <del>moved internationally</del> . The PRA should consider the relationship between the intended use of the seeds (e.g. research, planting, testing) and the potential for quarantine pests to establish. Phytosanitary measures should be applied based on the results of the PRA.	Better wording.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
170.	47	Editorial	PRAs for seeds should be performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. <u>When seed of a species is to be imported into a country for the first time, an NPPO may undertake a PRA to determine the potential risk of the seed its as a pest.</u> The PRA should consider the relationship between the intended use of the seeds (e.g. research, planting, testing) and the potential for quarantine pests to establish. Phytosanitary measures should be applied based on the results of the PRA.	Now includes PRA guidance for plants as pests.	Australia
171.	47	Substantive	PRAs for seeds should be performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. <u>When seeds of a species is to be imported into a country for the first time, an NP PO may undertake a PRA to determine the potential risk of seed as a pest.</u> The PRA should consider the relationship between the intended use of the seeds (e.g. research, planting, testing) and the potential for quarantine pests to establish. Phytosanitary measures should be applied based on the results of the PRA.	Inclusion to cover that particular aspect.	Singapore, China, Korea, Republic of, Ghana, Belize
172.	47	Substantive	PRAs for seeds <u>(include seeds as pests)</u> should be performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. The PRA should consider the relationship between the intended use of the seeds (e.g. research, planting, testing) and the potential for quarantine pests to establish. Phytosanitary measures should be applied based on the results of the PRA.	Should be conducted PRA for seeds as commodities or as pests (potential become weed risk)	Viet Nam
173.	47	Substantive	PRAs for seeds should be performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. The PRA should consider the relationship between the intended use of the seeds (e.g. research, planting, testing) and the potential for quarantine pests to establish. Phytosanitary measures <u>that required as phytosanitary import requirements</u> should be <u>technically justified</u> applied based on <del>the results of the</del> PRA.	The last sentence may be revised to complete the basic principle for establishing the phytosanitary measure. It should be based on technically justify through PRA.	Thailand
174.	47	Substantive	PRAs for seeds should be performed in accordance with ISPM 2:2007, ISPM 11:2013, <del>and</del> ISPM 21:2004 <u>and ISPM 32: 2009</u> . PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. <u>The establishment potential of identified regulated pests can be affected by PRA</u> <del>should consider the relationship between</del> the intended use of the seeds <u>internationally</u> (e.g. research, planting, testing) and the potential for	The added ISPM 32: 2009 is relevant to the Pest Risk Analysis process. Addition of "establishment potential of identified regulated pests can be affected by" and "internationally" for contextual clarification and use of fundamental principles of pest risk analysis. Replacement of the word "quarantine" with "regulated". The terminology as	South Africa



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>regulated quarantine</del> pests to establish <del>and spread</del> . <del>Phytosanitary measures should be applied based on the results of the PRA.</del>	defined in ISPM 5. 2013. Glossary of phytosanitary terms includes both quarantine and regulated non--quarantine pests. Addition of "and spread "after establish for consistency with paragraph 32. Deletion of last sentence reason being that it is a basic principle of the IPPC.	
175.	47	Substantive	PRAs for seeds should be performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. The PRA should consider <del>the relationship between the intended</del> use of the seeds (e.g. <del>research, planting,</del> testing) and the potential for quarantine pests to establish. Phytosanitary measures should be applied based on the results of the PRA.	The glossary definition for seed is for planting. These are uses rather than intended uses under ISPM 32-Categorisation of commodities according to their pest risk.	Australia
176.	47	Technical	PRAs for seeds <del>should be</del> performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. The PRA should consider the relationship between the intended use of the seeds (e.g. <del>research,</del> planting, <u>research,</u> testing) and the <u>likelihood of potential for quarantine</u> pests to establish, <u>spread and cause economic impact</u> . Phytosanitary measures should be applied based on the results of the PRA.	Planting, reserch and testing, is a better order of intended uses. The paragraph should cover quarantine pests and RNQPs, therefore the inclusion of 'economic impact'	EPPO, Georgia, European Union, Serbia, Algeria
177.	47	Technical	PRAs for seeds should be performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. PRAs for seeds should identify the regulated pests potentially associated with seeds moved internationally. The PRA should consider the relationship between the <del>intended use</del> <u>purpose for which of the seeds are imported</u> (e.g. research, planting, testing) and the potential for quarantine pests to establish. Phytosanitary measures should be applied based on the results of the PRA.	What is important to highlight in the specific case of seeds is the purpose for which seeds are imported considering that the intended use of seeds is planting (ISPM 32).	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
178.	47	Technical	PRAs for seeds <del>should be</del> performed in accordance with ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004. <del>PRAs for seeds</del> should identify the regulated pests potentially associated with seeds moved internationally. The PRA should consider the relationship between the intended use of the seeds (e.g. <del>research,</del> planting, <u>research,</u> testing) and the <u>likelihood of potential for quarantine</u> pests to establish, <u>spread and cause economic impact</u> . Phytosanitary measures should be applied based on the results of the PRA.	Planting, research and testing, is a better order of intended uses. The paragraph should cover quarantine pests and RNQPs, therefore the inclusion of 'economic impact'	Norway
179.	48	Substantive	<u>1.1. Seeds itself as pest</u>  <u>PRA for seeds itself as pest is described in ISPM 11 Annex.</u>  <u>1.4 1.2. Seeds as pathways</u>	add para for Seeds as pest	Korea, Republic of, Ghana, Belize

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
180.	49	Editorial	PRAs for seeds <del>should reflect</del> <del>are complicated</del> by the fact that some pests are seed-borne but not seed-transmitted.	Better wording and all PRAs are complicated.	EPPO, Georgia, Serbia
181.	49	Editorial	PRAs <del>should consider whether the seed is a pathway for quarantine pests. for</del> <del>s</del> Seeds are complicated by the fact that some pests are seed-borne but not seed-transmitted. <u>PRAs should make a distinction between whether pests are seed-borne or seed-transmitted.</u>	For clarification and accuracy	United States of America
182.	49	Editorial	PRAs for seeds <del>should reflect</del> <del>are complicated by</del> the fact that some pests are seed-borne but not seed-transmitted.	Better wording and all PRAs are complicated.	European Union
183.	49	Substantive	<del>PRAs for seeds are complicated by the fact that some pests are seed-borne but not seed-transmitted.</del>	Deletion of paragraph 49 for contextual clarification and duplication on paragraph 50. In addition, PRA is conducted according to standard procedures of the IPPC.	South Africa
184.	49	Substantive	<del>PRAs for seeds are complicated by the fact that some pests are seed-borne but not seed-transmitted.</del>	Unnecessary text	OIRSA
185.	50	Editorial	<del>A distinction should be made between seed-borne pests and seed-transmitted pests.</del>	This wording is a repetition and therefore not needed.	EPPO, Georgia, European Union, Serbia, Algeria
186.	50	Editorial	<del>A distinction should be made between seed-borne pests and seed-transmitted pests.</del>	See US comment in paragraph 49	United States of America
187.	50	Editorial	A distinction should be made between seed-borne pests and seed-transmitted pests <u>during the pathway analysis.</u>	Addition of "during the pathway analysis" for contextual clarification.	South Africa
188.	50	Substantive	<del>A distinction should be made between seed-borne pests and seed-transmitted pests.</del>	No need to make distinctions, because the decisions are made by PRA	NEPPO, Bahrain, Morocco, Algeria
189.	50	Substantive	<del>A distinction should be made between seed-borne pests and seed-transmitted pests.</del>	Unnecessary text, already covered by the definitions	OIRSA
190.	51	Editorial	<del>Some pests that are not seed-borne may be associated with the seed-crop and subsequently be carried with a seed lot as contaminating pests (e.g. sclerotia, seeds of plants as pests).</del>	Move this paragraph till after paragraph 54, this is a more logical order, after the more general considerations.	EPPO, Georgia, European Union, Serbia, Algeria
191.	51	Editorial	<del>Some pests that are not seed-borne may be associated with the seed-crop and subsequently be carried with a seed lot as contaminating pests (e.g. sclerotia, seeds of plants as pests).</del>	Concept captured in new wording in US comment on paragraph 52.	United States of America

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
192.	51	Editorial	Some pests that are not seed-borne may be associated with the seed crop and subsequently be carried with a seed lot as contamin <del>ating</del> pests (e.g. sclerotia, seeds of plants as pests <u>and hitch hiking insects</u> ).	Replacement of “contaminating” with “contaminant” to make the text clearer. Addition of “and hitch hiking insect” as part of examples of contaminants.	South Africa
193.	51	Substantive	Some pests <u>or regulated articles</u> that are not seed-borne may be associated with the seed crop and subsequently be carried with a seed lot as <del>contaminants contaminating pests</del> (e.g. <u>soil, plant debris</u> , sclerotia, seeds of plants as pests).	To expand the coverage i.e. regulated articles and to cover contaminants associated with the seed consignments i.e. soil, plant debris.	Singapore, China, Korea, Republic of, Ghana, Belize
194.	51	Substantive	Some pests <u>or regulated articles</u> that are not seed-borne may be associated with the seed crop and subsequently be carried with a seed lot as <del>contaminants contaminating pests</del> (e.g. <u>plant debris</u> , sclerotia, seeds of plants as pests).	To cover regulated articles and contaminants associated with the seed consignments, i.e., plant debris.	Japan
195.	51	Substantive	Some pests <u>or regulated articles</u> that are not seed-borne may be associated with the seed crop and subsequently be carried with a seed lot as contamin <del>ants</del> <u>ing</u> pests (e.g. <u>soil, plant debris</u> , sclerotia, seeds of plants as pests).	This section also needs to include regulated articles that can be seed borne and could be a pest risk.	Australia
196.	52	Editorial	<del>If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement.</del>	Move this paragraph till after paragraph 54, this is a more logical order, after the more general considerations.	EPPO, Georgia, European Union, Serbia, Algeria
197.	52	Editorial	If it has been determined that the particular seed may carry a potential quarantine pest, <del>care</del> <u>it</u> should be <del>taken to determine</del> <u>d</u> whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement.	Better wording.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
198.	52	Editorial	<del>If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement.</del>	This is part of the PRA process.	Australia
199.	52	Substantive	<del>If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement.</del>	Redundant as this is part of the PRA process.	Singapore, China, Korea, Republic of, Ghana, Belize
200.	52	Substantive	<del>If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement.</del>	This paragraph is not needed, this considerations are taken in account in the ISPM-11	NEPPO, Bahrain, Morocco
201.	52	Substantive	<del>If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area,</del>	US proposes to delete paragraph 53, so incorporating the concept here	United States of

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<u>If a seed is determined to be a pathway for a particular quarantine pests, its probability of establishment in the PRA area needs to be determined</u> so as to avoid any unjustified phytosanitary import requirement. <u>The PRA should consider whether the transfer of seed-borne pests has been observed under field conditions or only under laboratory conditions.</u>		America
202.	52	Substantive	<del>If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement.</del>	Delete paragraph because this factor is considered in all PRAs and is not specific to seed.	Canada
203.	52	Substantive	If it has been determined that the particular seed may carry a potential <u>regulated quarantine</u> pest, care should be taken to determine whether the pest in question can actually establish <u>and spread</u> in the PRA area, <del>so as</del> to avoid any unjustified phytosanitary import requirements.	Replacement of the word “quarantine” with “regulated”. The terminology as defined in ISPM 5. 2013 Glossary of phytosanitary terms includes both quarantine and regulated non-quarantine pests. Addition of “and spread” after establish for consistency with paragraph 47. Deletion of “so as” in order to make the sentence grammatically correct.	South Africa
204.	52	Substantive	<del>If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement.</del>	Redundant, furthermore contradictory.	OIRSA
205.	52	Technical	If it has been determined that the particular seed may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish in the PRA area, so as to avoid any unjustified phytosanitary import requirement. <u>Phytosanitary import requirements established for regulated non quarantine pests should be determined through PRA (ISPM 21:2004) and those pests should be regulated in the importing country.</u>	RNQPs are regulated pests that are also relevant in the international movement of seeds. Text added to make a reference to these pests.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
206.	53	Editorial	Many studies have documented cases in which <del>transmission</del> <u>transfer</u> by seeds of seed-borne pests <u>that has been observed</u> <del>occurs</del> under laboratory conditions but <del>then such transferral</del> <u>or confirmed</u> has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.	Better wording to make it more readable.	EPPO, Georgia, European Union, Serbia, Algeria
207.	53	Editorial	Many studies have documented cases in which <del>transfer</del> <u>transmission</u> by seed of seed-borne pests occurs under laboratory conditions but then such <del>transmission</del> <u>transferral</u> has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.	better term	ISTA*
208.	53	Editorial	<del>Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never</del>	This is covered in paragraph [50] on seed borne and seed transmitted pests.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
209.	53	Substantive	<del>been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.</del> <del>Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.</del>	This paragraph seemed redundant and appeared to be an opinion rather than anything appropriate for a standard.	Singapore
210.	53	Substantive	<del>Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.</del>	Status subjected to country's consideration.	China, Korea, Republic of, Ghana
211.	53	Substantive	<del>Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.</del>	This paragraph is not needed, this consideration are taken in account in the ISPM-11	NEPPO, Bahrain, Morocco
212.	53	Substantive	Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never been observed under field conditions. <u>This should be taken into consideration when assessing seeds as a pathway.</u> <del>adding to the uncertainty of PRA judgements on seeds as pathways.</del>	'Uncertainty' is too a strong a word to use in this context.	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
213.	53	Substantive	<del>Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.</del>	This paragraph undermines the PRA process. Suggest to delete.	United States of America
214.	53	Substantive	<del>Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.</del>	Delete paragraph because this factor is considered in all PRAs and is not specific to seed.	Canada
215.	53	Substantive	<del>Many studies have documented cases in which T</del> ransmission <del>fer</del> by seed of seed-borne pests occurs under laboratory conditions but <del>may not then such transferral has never been</del> <u>be</u> observed under field conditions. <del>adding to the</del> <u>This may add to the level of</u> uncertainty of PRA judgements on seeds as pathways.	Deletion of “Many studies have documented cases in which transfer” and “ then such transfer has never been” and “adding to the”, and addition of the word “transmission” for contextual clarity. Addition of the wording: “this may add to the level of”, the reason being that it is a general principle of the IPPC.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
216.	53	Substantive	<del>Many studies have documented cases in which transfer by seed of seed-borne pests occurs under laboratory conditions but then such transferral has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.</del>	It generalizes without concrete inputs	OIRSA
217.	53	Technical	Many studies have documented cases in which <del>transfer</del> <u>transmission</u> by seed of seed-borne pests occurs under <del>laboratory</del> <u>artificial</u> conditions but then such <del>transferral</del> <u>transmission</u> has never been observed under <del>field</del> <u>natural</u> conditions, adding to the uncertainty of PRA judgements on seeds as pathways.	1. For reasons of consistency. In [28] a seed transmitted pest is defined. So "transfer" is replaced by "transmission". 2. Change "laboratory conditions" to "artificial conditions" and "field conditions" to "natural conditions" to avoid any misunderstanding about laboratories performing these tests. "Artificial conditions" are those when mother plants are inoculated and therefore become infected, when no routine sanitation measures (such as disinfection of tomato seeds) have been used, seeds are sown directly after harvesting as opposed to being dried, cleaned and sorted, etc.	ISF*
218.	53	Technical	Many studies have documented cases in which <del>transfer</del> <u>transmission</u> by seed of seed-borne pests occurs under laboratory conditions but then such <del>transferral</del> <u>transmission</u> has never been observed under field conditions, adding to the uncertainty of PRA judgements on seeds as pathways.	Transmission and seed transmitted should be used consistently throughout the standard.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
219.	54	Editorial	Consideration of biological and epidemiological characteristics of specific pest groups aids in determining the likelihood to infest a seed and its potential of introduction. Characteristics of seed-borne and seed-transmitted pest groups are provided in <del>Annex</del> <u>Appendix</u> 1 of this standard. This information may be used as guidance when conducting a PRA.	see explanation under Appendix 1 in paragraph 180.	Singapore, China, Korea, Republic of, Ghana, Belize
220.	54	Editorial	Consideration of biological and epidemiological characteristics of specific pest groups aids in determining the likelihood to infest a seed and its potential of introduction. Characteristics of seed-borne and seed-transmitted pest groups are provided in Annex 1 of this standard. This information may be used as guidance when conducting a PRA.  <u>Some pests that are not seed-borne may be associated with the seed crop and subsequently be carried with a seed lot as contaminating pest (e.g. sclerotia, seeds of plants as pests).</u>  <u>If it has been determined that the seeds may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish and spread in the PRA area, to ensure that phytosanitary import</u>	Move paragraph 51 and 52 to after 54, as a more logical order after the more general aspects of paragraph 54, with some better wording.	EPPO, Georgia, Serbia, Algeria



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<u>requirements are technically justified.</u>		
221.	54	Editorial	Consideration of biological and epidemiological characteristics of specific pest groups aids in determining the likelihood <u>of the pest</u> to infest a seed and <del>the its</del> potential <u>for the of-introduction of the pest</u> . Characteristics of seed-borne and seed-transmitted pest groups are provided in Annex 1 of this standard. This information may be used as guidance when conducting a PRA.	New wording within the first sentence to provides more clarity.	Canada
222.	54	Editorial	Consideration of biological and epidemiological characteristics of specific pest groups aids in determining the likelihood to infest a seed and its potential of introduction. Characteristics of seed-borne and seed-transmitted pest groups are provided in Annex 1 of this standard. This information may be used as guidance when conducting a PRA.  <u>Some pests that are not seed-borne may be associated with the seed crop and subsequently be carried with a seed lot as contaminating pest (e.g. sclerotia, seeds of plants as pests).</u>  <u>If it has been determined that the seeds may carry a potential quarantine pest, care should be taken to determine whether the pest in question can actually establish and spread in the PRA area, to ensure that phytosanitary import requirements are technically justified.</u>	Move paragraph 51 and 52 to after 54, as a more logical order after the more general aspects of paragraph 54, with some better wording.	European Union
223.	54	Substantive	Consideration of biological and epidemiological characteristics of specific pest groups aids in determining the likelihood to infest a seed and its potential of introduction. Characteristics of seed-borne and seed-transmitted pest groups are provided in <del>Annex</del> Appendix 1 of this standard. This information may be used as guidance when conducting a PRA.	Refer to the explanation of comment on paragraph [180].	Japan
224.	54	Substantive	<del>Consideration of biological and epidemiological characteristics of specific pest groups aids in determining the likelihood of regulated pests to infest a seed and its introduction potential of introduction can be aided by the.</del> Characteristics of <u>specific pest groups as seed-borne and seed-transmitted pest groups</u> are provided in Annex 1 of this standard. This information may be used as <u>a general guidance during the when conducting a PRA process as exceptions are likely to occur within each pest group.</u>	Deletion of the highlighted wordings and addition for contextual clarity since this is a general guideline wprinciples of pest risk analysis.	South Africa
225.	54	Technical	Consideration of biological and epidemiological characteristics of specific pest groups <del>may help</del> aids in determining the likelihood <u>of a pest</u> to infest <del>a seeds</del> and its potential of introduction. <u>Some broad guidelines on the likelihood of pests from various</u> <del>Characteristics of seed-borne and seed-transmitted</del> pest groups <u>to be associated with seeds</u> are provided in Annex 1 <del>of this standard. This information may be used as guidance when conducting a PRA.</del>	This better describes what is actually in the annex.	EPPO, Georgia, European Union, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
226.	54	Technical	Consideration of biological and epidemiological characteristics of specific pest groups aids in determining the likelihood to infest a seed and its potential of introduction. <del>Characteristics of seed-borne and seed-transmitted pest groups are</del> <u>Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish and spread is</u> provided in <del>Annex</del> Appendix 1 of this standard. This information may be used as guidance when conducting a PRA.	To be consistent with paragraph 180. Annex 1 should be an appendix as it is a general document only for reference purposes.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
227.	55	Editorial	<del>1.2 Intended-u</del> <u>Use</u>	There are not "intended use" but "use" and language needs to consistent all over the standard.	New Caledonia*
228.	55	Substantive	<del>1.2 Intended-U</del> <u>use</u>	In the future , some problems could appear concerning many new intended uses	New Caledonia*
229.	55	Substantive	<del>1.2 Intended-use</del> <u>Pest risk associated with seed use</u>	For clarity, to reflect the content associated with this section.	Japan
230.	55	Substantive	<del>1.2 Intended</del> <u>Pest risk associated with seed use</u>	The glossary definition for seed is for planting. These are uses rather than intended uses under ISPM 32-Categorisation of commodities according to their pest risk.	Australia
231.	55	Technical	<del>1.2 Intended</del> <u>Pest risk associated with seed use</u>	For clarity to reflect the content associated with this section.	Singapore, China, Korea, Republic of, Ghana, Belize
232.	55	Technical	<del>1.2 Intended-use</del> <u>Purpose of Seeds</u>	Intended use for seeds is planting.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
233.	56	Substantive	The intended use of seeds (e.g. breeding, multiplication, testing, field planting, growing under NPPO control) moved internationally may impact the probability of establishment. Seeds may be moved for purposes other than planting (i.e. trans-shipment) or may be planted under special conditions. The <u>pest risk associated with intended use of seeds</u> should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).	For more clarity to reflect that the concern is on the pest risk associated with the use of seeds.	Singapore, China, Korea, Republic of, Ghana, Belize
234.	56	Substantive	The intended use of seeds (e.g. breeding, multiplication, testing, field planting, growing under NPPO control) moved internationally may impact the probability of establishment. Seeds may be moved for purposes other than planting (i.e. trans-shipment) or may be planted under special conditions. The intended use should be considered when conducting the PRA and establishing phytosanitary	For the consistency with the text of the draft ISPM	NEPPO, Bahrain, Morocco



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			measures (ISPM 32:2009).  <u>This paragraph needs to be reviewed and modified according to our general cge neral comment</u>		
235.	56	Substantive	The intended use of seeds (e.g. breeding, multiplication, testing, field planting, growing under NPPO control) moved internationally may impact the probability of establishment <u>of quarantine pests</u> . Seeds may be moved for purposes other than planting ( <u>e.g. conditioning and eventual re-export</u> ) <del>i.e. trans-shipment</del> or may be planted under special conditions. The intended use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).	1. Add "of quarantine pests" to the end of the first sentence because it adds clarity. 2. Delete trans-shipment as it is not clear what this term means. Add "(e.g. conditioning and eventual re-export)" because these are purposes other than planting for which seeds are moved internationally.	Canada
236.	56	Substantive	The intended use of seeds (e.g. breeding, multiplication, testing, field planting, growing under NPPO control) moved internationally may impact the probability of establishment. Seeds may be moved for purposes other than planting (i.e. trans-shipment) or may be planted under special conditions. The intended use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).	regarding: (i.e trans-shipment) Comment: Not only in this case	ISTA*
237.	56	Substantive	The intended use of seeds (e.g. breeding, multiplication, testing, field planting, growing under NPPO control) moved internationally may impact the probability of establishment. Seeds may be moved for purposes other than planting (i.e. trans-shipment) or may be planted under special conditions. The <u>pest risk associated with intended the use of seeds</u> should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).	Phytosanitary measures should be decided based on pest risk associated with the intended use of seeds through conducting PRA.	Japan
238.	56	Substantive	The intended use of seeds (e.g. breeding, multiplication, testing, field planting, growing under NPPO control) moved internationally may impact the probability of establishment <u>and spread, and should be considered when conducting the PRA and determining phytosanitary measures (ISPM 32: 2009).</u> <del>Seeds may be moved for purposes other than planting (i.e. trans-shipment) or may be planted under special conditions. The intended use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).</del>	Deletion of the last sentence of the paragraph and addition of "and spread, and should be considered when conducting the PRA and determining phytosanitary measures (ISPM 32:2009)" for contextual clarity due to the fact that phytosanitary measures should depend on the risk level associated with the intended use of the imported seeds.	South Africa
239.	56	Substantive	The <del>intended</del> use of seeds (e.g. breeding, multiplication, testing, field planting, <del>growing under NPPO control</del> ) moved internationally may impact the probability of establishment. Seeds may be moved for purposes other than planting (i.e. trans-shipment) or may be planted under <u>quarantine</u> <del>special</del> conditions. The <del>intended</del> use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).	Growing under NPPO control is a phytosanitary measure to manage risk, not an intended use. Special conditions in a risk assessment sense would be quarantine conditions.	Australia
240.	56	Technical	The intended use <del>of seeds</del> (e.g. breeding, multiplication, testing, field planting, <del>growing under NPPO control</del> ) <del>of seeds moved internationally</del> may <del>affect</del> <del>impact</del> the <u>likelihood</u> <del>probability</del> of <u>pest</u> establishment. <u>Samples of seeds</u> may be moved	Text simplified and made more clear by using IPPC terminology, including a footnote.	EPPO, Georgia, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p>for purposes other than planting (i.e. <del>destructive laboratory testing</del><del>trans-shipment</del>) or may be planted under <del>retricted</del><del>special</del> conditions <del>that in themselves may reduce the pest risk, because pest risk varies with the intended uses of seeds. The intended use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009)</del><u>Pest risks can be broadly ranked from lowest to highest as follows:</u>.</p> <p><u>Add footnote: According to the ISPM 5 definition, categories 1 and 2 strictly do not belong to the commodity class of seeds. However, it should be noted that samples of seeds (intended for tetsing) collected from seed lots (intended for planting) are still considered as seeds. Therefore these categories are included here to provide support to NPPO spets risk assessments.</u></p>		
241.	56	Technical	<p>The intended use of seeds (e.g. breeding, multiplication, testing, field planting, growing under NPPO control) moved internationally may impact the probability of establishment. Seeds may be moved for purposes other than planting (i.e. <del>trans-shipment</del> <u>destructive analysis</u>) or may be planted under special conditions. The <u>risk level associated with the</u> intended use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).</p>	<p>1. (first sentence) 'Destructive analysis' is a better example of an alternative 'intended use' of seeds. 2. (second sentence) Phytosanitary measures should depend on the risk level associated with the intended use of the imported seeds.</p>	ISF*
242.	56	Technical	<p>The <del>intended use purpose for which</del>of seeds (e.g. breeding, <u>seed</u> multiplication, <u>seed</u> testing, field planting, <del>growing under NPPO control</del>) <u>are</u> moved internationally may impact the probability of establishment <u>of quarantine pests</u>. <del>Seeds may be moved for purposes other than planting (i.e. trans-shipment) or may be planted under special conditions. The purpose intended use</del> should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009).</p>	<p>See comment in Para 55. Growing under NPPO control was deleted because is not a purpose is like a post entry quarantine which is a phytosanitary measure. Second sentence was deleted because examples of purposes are mentioned in the first sentence (testing). Besides, the concept of "trans-shipment" is not clear in this context.</p>	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
243.	56	Technical	<p>The intended use <del>of seeds</del> (e.g. breeding, multiplication, testing, field planting, <del>growing under NPPO control</del>) <u>of seeds moved internationally</u> may <del>affect</del><u>impact</u> the <del>likelihood</del><u>probability</u> of <del>pest</del> establishment. <u>Samples of seeds</u> may be moved for purposes other than planting (i.e. <del>destructive laboratory testing</del><del>trans-shipment</del>) or may be planted under <del>retricted</del><del>special</del> conditions <del>that in themselves may reduce the pest risk, because pest risk varies with the intended uses of seeds. The intended use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009)</del><u>Pest risks can be broadly ranked from lowest to highest as follows:</u>.</p> <p><u>Add footnote: According to the ISPM 5 definition, categories 1 and 2 strictly do not belong to the commodity class of seeds. However, it should be noted that samples of seeds (intended for testing) collected from seed lots (intended for</u></p>	<p>Text simplified and made more clear by using IPPC terminology, including a footnote.</p>	European Union

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<u>planting) are still considered as seeds. Therefore these categories are included here to provide support to NPPO's pest risk assessments.</u>		
244.	56	Technical	The intended use <del>of seeds</del> (e.g. breeding, multiplication, testing, field planting, <del>growing under NPPO control</del> ) <u>of seeds moved internationally</u> may <del>affect</del> <u>impact</u> the <del>likelihood</del> <u>probability</u> of <del>pest</del> establishment. <u>Samples of seeds may be moved for purposes other than planting (i.e. <del>destructive laboratory testing</del> <u>trans-shipment</u>) or may be planted under <del>restricted</del> <u>special</u> conditions that in themselves may reduce the pest risk, because pest risk varies with the intended uses of seeds. The intended use should be considered when conducting the PRA and establishing phytosanitary measures (ISPM 32:2009)</u> <u>Pest risks can be broadly ranked from lowest to highest as follows:</u>	Text simplified and made more clear by using IPPC terminology, including a footnote.	Norway
			<u>Add footnote: According to the ISPM 5 definition, categories 1 and 2 strictly do not belong to the commodity class of seeds. However, it should be noted that samples of seeds (intended for testing) collected from seed lots (intended for planting) are still considered as seeds. Therefore these categories are included here to provide support to NPPO pests risk assessments.</u>		
245.	57	Editorial	<del>There is a range in the level of pest risk that may be associated with the various intended uses of seeds. While recognizing that the rankings may vary depending on circumstance, the risks can be broadly ranked from lowest pest risk to highest pest risk as follows:</del>	Included in paragraph 56.	EPPO, Georgia, European Union, Serbia, Algeria
246.	57	Editorial	<del>There is a range in the level of pest risk that may be associated with the various intended uses of seeds. While recognizing that the rankings may vary depending on circumstance, the risks can be broadly</del> <u>classified</u> <del>ranked</del> <u>from lowest pest risk to highest pest risk as follows:</u>	Restates information from previous sentence in paragraph 56.	United States of America
247.	57	Substantive	<u>Based on the</u> <del>There is a range in the level of pest risk that may be associated with the various intended uses of seeds, the pest risks levels</del> <u>While recognizing that the rankings may vary. Therefore, depending on circumstance,</u> the risks can be broadly <u>categorized</u> <del>ranked from lowest pest risk to highest pest risk as follows:</del>	Deletion and addition of the highlighted wordings for contextual clarity and also to emphasize the fundamental principles of pest risk analysis.	South Africa
248.	57	Substantive	There is a range in the level of pest risk that may be associated with the various <del>intended</del> uses of seeds. While recognizing that the rankings may vary depending on circumstance, the risks can be broadly ranked from lowest pest risk to highest pest risk as follows:	The glossary definition for seed is for planting. These are uses rather than intended uses under ISPM 32-Categorisation of commodities according to their pest risk.	Australia
249.	57	Technical	<u>During pest risk assessment stage the level of pest risk may vary according to the purpose of seeds.</u> <del>There is a range in the level of pest risk that may be associated with the various intended uses of seeds.</del> While recognizing that the rankings may vary depending on circumstance, the <u>pest risks</u> <del>can</del> be broadly ranked from lowest pest risk to highest pest risk as follows:	To provide further guidance of the stage of PRA where NPPOs should consider the purpose for which seeds are moved.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
250.	58	Substantive	1. <del>Seeds with no potential to germinate or generate plants.</del> <u>1. Seeds not for planting</u>  <u>(1) Seeds used for testing or destructive analysis</u>	Proposed re-arrangement for paragraph 58 - 72 for more clarity.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
251.	58	Substantive	1. Seeds with no potential to germinate or generate plants.	This statement may not suitable with new definition of seeds	Indonesia
252.	58	Substantive	1. <del>Seeds with no potential to germinate or generate plants.</del>	Not in consistency with the intended use definition	NEPPO, Bahrain, Morocco
253.	58	Substantive	<u>1. Seeds not for planting</u>  <u>(1) Seeds used for testing or destructive analysis</u> <del>with no potential to germinate or generate plants.</del>	For greater clarity of pest risk associated with seed use.	Japan
254.	58	Substantive	1. Seeds <u>not for release into the environment</u> <del>with no potential to germinate or generate plants.</del>	Seed with no potential to germinate is not a seed use. The main point here is that there are uses for seed that don't involve the seed being released into the environment for planting.	Australia
255.	58	Technical	1. <u>Samples of seeds</u> with no potential to germinate or generate plants.	To use terminology of IPPC and let this category fit into the commodity class seeds	EPPO, Georgia, European Union, Norway, Serbia
256.	58	Technical	1. <del>Seeds with no potential to germinate or generate plants.</del>	These seeds are not covered by the ISPM 5 definition of "seeds".	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
257.	59	Substantive	<del>For example, devitalized seeds imported for testing or destructive analysis.</del>	Redundant after comment on para 58.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
258.	59	Substantive	<del>For example, devitalized seeds imported for testing or destructive analysis.</del>	For greater clarity of pest risk associated with seed use.	Japan
259.	59	Substantive	For example, <del>devitalized</del> seeds imported for <u>growth analysis</u> , testing or destructive <u>sampling analysis under quarantine conditions</u> .	In this case, it is not relevant that seed is devitalised only that it is not for release in the environment.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
260.	59	Technical	<del>For example, devitalized seeds imported for testing or destructive analysis.</del>	As a consequence of deleting Para. 58	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
261.	60	Editorial	<del>Such</del> These seeds are not intended or suitable for planting <del>or and will not be released</del> into the environment of the PRA area. For this category, NPPOs should not require phytosanitary measures as the <del>pest risk</del> is negligible <del>risk</del> .	Better wording to increase readability.	EPPO, Georgia, European Union, Serbia, Algeria
262.	60	Substantive	These seeds are not intended or suitable for planting <u>due to no potential to germinate or generate plants</u> and will not be released into the environment of the PRA area. <del>For this category, NPPOs should not require phytosanitary measures as there is negligible risk.</del>	Proposed re-arrangement of para 58 - 72. Last sentence not necessary.	Singapore, China, Thailand, Korea, Republic of, Belize
263.	60	Substantive	These seeds are not intended or suitable for planting and will not be released into the environment of the PRA area. For this category, NPPOs <del>may</del> should not require phytosanitary measures as there is negligible risk.	Should is here to definite and this is more up to the authorities.	EPPO, Georgia, European Union, Serbia, Algeria
264.	60	Substantive	These seeds are not intended or suitable for planting and will not be released into the environment of the PRA area. For this category, NPPOs <del>may</del> should not require phytosanitary measures as the <del>pest risk</del> is negligible <del>risk</del> .	Should is here to definite and this is more up to the authorities.	Norway
265.	60	Substantive	These seeds are not intended or suitable for planting and will not be released into the environment of the PRA area. For this category, NPPOs <del>may</del> should not require <u>minimal</u> phytosanitary measures as there is negligible risk.	This category of seeds may still require minimal phytosanitary measures if necessary despite the negligible risk.	Ghana
266.	60	Substantive	1. These seeds are not intended or suitable for planting <u>due to having no potential to germinate or generate plants</u> and will not be released into the environment of the PRA area. <del>For this category, NPPOs should not require phytosanitary measures as there is negligible risk.</del>	For greater clarity of pest risk associated with seed use.	Japan
267.	60	Substantive	Ces semences ne sont ni destinées ni adaptées à la plantation et elles ne seront pas libérées dans l'environnement de la zone ARP. En ce qui concerne cette catégorie, les ONPV <del>ne</del> devraient <del>pas</del> imposer des <u>mesures</u> phytosanitaires <u>minimale</u> , le risque étant négligeable.	Un risqué, minimal soit il reste un risque et des mesures minimales devraient être prises pour tenir compte de ce risque.	Burundi
268.	60	Substantive	Ces semences ne sont ni destinées ni adaptées à la plantation et elles ne seront pas libérées dans l'environnement de la zone ARP. En ce qui concerne cette catégorie, les ONPV <del>ne</del> devraient <del>pas</del> imposer de mesure phytosanitaire <u>minimale</u> , le risque étant négligeable.	un risque, négligeable soit-il, reste un risque. des mesures minimales devraient être prises pour en tenir compte	Gabon

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
269.	60	Substantive	These seeds are not intended or suitable for planting and will not be released into the environment of the PRA area. For this category, NPPOs should <u>apply not require</u> phytosanitary measures <u>that are proportional to the pest as there is negligible risk identified.</u>	Deletion and addition of the highlighted information because there are still risks in terms of movement of seeds.	South Africa
270.	60	Substantive	These seeds are not intended or suitable for planting and will not be released into the environment of the PRA area. <del>For this category, NPPOs should not require phytosanitary measures as there is negligible risk.</del>	This is an outcome of a PRA.	Australia
271.	60	Technical	These seeds are not intended or suitable for planting and will not be released into the environment of the PRA area. <del>For this category, NPPOs should not require phytosanitary measures as there is negligible risk.</del>	It is entirely the NPPO authority to set requirement	New Caledonia*
272.	60	Technical	<del>These seeds are not intended or suitable for planting and will not be released into the environment of the PRA area. For this category, NPPOs should not require phytosanitary measures as there is negligible risk.</del>	As a consequence of deleting Para. 58	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
273.	61	Editorial	1. Seeds not for planting but <u>having retained</u> viability.	Better wording	EPPO, Georgia, European Union, Serbia, Algeria
274.	61	Substantive	1. <del>Seeds not for planting but retaining viability.</del>	Proposed re-arrangement of para 58 - 72. This is not necessary.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
275.	61	Substantive	2. Seeds not for planting but retaining viability.	This statement may not suitable with new definition of seeds	Indonesia
276.	61	Substantive	1. <del>Seeds not for planting but retaining viability.</del>	For greater clarity of pest risk associated with seed use.	Japan
277.	61	Substantive	1. <del>Seeds not for planting but retaining viability.</del> A	Ammalgamated as one item of seed not for release into the environment.	Australia
278.	61	Technical	1. Seeds not for planting <del>but retaining viability.</del>	Paragraphs 58 and 61 need to be combined under a single title : "Seed not for planting"	New Caledonia*
279.	61	Technical	1. <u>Samples of</u> eeds not for planting but retaining viability.	To use terminology of IPPC and let this category fit into the commodity class seeds	EPPO, Georgia, European Union, Serbia



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
280.	61	Technical	1. <u>Samples of seeds</u> not for planting but <u>having</u> retained <del>ed</del> ing viability.	To use terminology of IPPC and let this category fit into the commodity class seeds	Norway
281.	62	Substantive	<del>For example, seeds used for destructive biochemical analysis, diagnostic test controls and other forms of laboratory testing.</del> (2) <u>Seeds used for destructive biochemical analysis, diagnostic test controls and other forms of laboratory testing.</u>	Proposed re-arrangement of para 58 -72.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
282.	62	Substantive	For example, seeds used for destructive biochemical analysis, diagnostic test controls, <del>and</del> other forms of laboratory testing, <u>and reference herberia.</u>	Add herberia to this list because they are a common seed commodity that is being traded.	Canada
283.	62	Substantive	<del>For example,</del>  (2) <del>s</del> Seeds used for destructive biochemical analysis, diagnostic test controls and other forms of laboratory testing.	For greater clarity of pest risk associated with seed use.	Japan
284.	62	Technical	<del>For example, seeds used for destructive biochemical analysis, diagnostic test controls and other forms of laboratory testing.</del>	Not relevant and superceded.	Australia
285.	63	Substantive	<del>In some cases,</del> these seeds may be germinated ( <u>i.e. retaining viability</u> ) to facilitate testing, but they are not intended for planting and will not be released into the environment of the PRA area. Laboratory or similar confinement is sufficient as a phytosanitary measure.	For more clarity to reflect viable seeds.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
286.	63	Substantive	In some cases, these seeds may be germinated to facilitate testing, but they are not intended for planting and will not be released into the environment of the PRA area. Laboratory or similar confinement <u>may be</u> <del>is</del> sufficient as a phytosanitary measure.	Delete "is" and add "may be" since it is not certain that it is sufficient as a phytosanitary measure.	Canada
287.	63	Substantive	<del>In some cases, these</del> <u>These</u> seeds may be germinated ( <u>i.e. retain viability</u> ) to facilitate testing, but they are not intended for planting and will not be released into the environment of the PRA area. Laboratory or similar confinement is sufficient as a phytosanitary measure.	For greater clarity of pest risk associated with seed use.	Japan
288.	63	Substantive	In some cases, these seeds may be germinated to facilitate testing, but they are not intended for planting and will not be released into the environment of the PRA area. <u>For this category, NPPOs should apply phytosanitary measures that are proportional to the pest risk identified.</u> <del>Laboratory or similar confinement is sufficient as a phytosanitary measure.</del>	Replacement of "laboratory or similar" with new sentence the reason being that there are still risks in terms of movement of seeds. Deletion of "Confinement is sufficient as a phytosanitary measure" for contextual clarity.	South Africa
289.	63	Substantive	<del>In some cases, these seeds may be germinated to facilitate testing, but they are not intended for planting and will not be released into the environment of the PRA area. Laboratory or similar confinement is sufficient as a phytosanitary</del>	Ammalgamated to make one category of seed not for release into the environment.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>measure.</del>		
290.	63	Technical	In some cases, <del>such these</del> seeds may be germinated to facilitate testing, but <del>they</del> are not intended for planting <del>or and will not be released</del> into the environment of the PRA area. <u>Requirements for Laboratory testing or similar confinement and the ultimate destruction should be</u> is sufficient as a phytosanitary measure.	More comprehensive wording including the ultimate destruction.	EPPO, Georgia, European Union, Norway, Serbia
291.	63	Technical	In some cases, these seeds may be germinated to facilitate testing, but <del>they are their purpose is not intended</del> for planting <del>and will not be released into the environment of the PRA area. Laboratory or similar confinement is sufficient as a phytosanitary measure.</del> <u>Therefore this purpose is of lowest pest risk</u>	Phytosanitary measures may be established after pest risk management stage and not at this stage of the PRA	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
292.	64	Editorial	1. Seeds for planting under restricted conditions <del>and not for general release.</del>	Redundant.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
293.	64	Substantive	1. <del>Seeds for planting under restricted conditions and not for general release.</del> <u>2. Seeds for planting</u>  <u>(1) Seeds planted for planting under restricted controlled conditions and not for general release.</u>	Proposed re-arrangement for para 58 - 72 for more clarity.	Singapore, China, Korea, Republic of, Ghana, Belize
294.	64	Substantive	1. <del>Seeds for planting under restricted conditions and not for general release.</del> <u>2. Seeds for planting</u>  <u>(1) Seeds for planting under restricted controlled conditions and not for general release.</u>	Proposed re-arrangement for para 58 - 72 for more clarity.	Thailand
295.	64	Substantive	<u>2. Seeds for planting</u>  <u>(1) Seeds planted for planting under restricted controlled conditions and not for general release.</u>	For greater clarity of pest risk associated with seed use.	Japan
296.	64	Substantive	1. <del>Seeds for planting under restricted conditions and not for general release.</del>	This has been amalgamated into seed not for release into the environment.	Australia
297.	64	Technical	1. Seeds for planting under <u>restricted conditions</u> <del>restricted conditions</del> and not for general release.	to be clarified	New Caledonia*
298.	65	Editorial	<del>For example, seeds imported for research or for growth in protected environments (e.g. glasshouses, growth chambers).</del>	This has been amalgamated in seed not for release.	Australia



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
299.	65	Substantive	<del>For example, S</del> seeds are imported for research <del>or for growth</del> in protected environments (e.g. glasshouses, growth chambers).	Proposed re-arrangement of para 58 -72.	Singapore, China, Korea, Republic of, Ghana, Belize
300.	65	Substantive	<del>For example, S</del> seeds are imported for research <del>or for growth</del> in protected environments (e.g. glasshouses, growth chambers).	Proposed re-arrangement of para 58 -72.	Thailand
301.	65	Substantive	For example, seeds imported for research or for growth in protected environments (e.g. glasshouses, growth chambers).	Regarding: (e. g. glasshouses, growth chambers) ... Does it include production glasshouses like for tomato for example? Because in this case, the protection is not the same as for a greenhouse for research	ISTA*
302.	65	Substantive	<del>For example, seeds</del> Seeds are imported for research <del>or for growth</del> in protected environments (e.g. glasshouses, growth chambers).	For greater clarity of pest risk associated with seed use.	Japan
303.	65	Technical	For example, seeds imported for research or for growth in protected environments (e.g. glasshouses, growth chambers) <u>should be planted under conditions that prevent their release into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.</u>	EWG RU Bykovo: combination of paragraphs 65 & 66 for clarity, gramatical structure, and meaning of the sentence.	EPPO, Georgia, Serbia, Algeria
304.	65	Technical	For example, seeds imported for research <del>or for growth in protected environments</del> (e.g. <u>breeding or other</u> <del>glasshouses, growth chambers</del> ).	Except for seeds for research purposes, pest risk is independent if the seed is planted under restricted conditions or under field conditions. If not paragraph should be clarified	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
305.	65	Technical	For example, seeds imported for research or for growth in protected environments (e.g. glasshouses, growth chambers) <u>should be planted under conditions that prevent their release into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.</u>	Combination of paragraphs 65 & 66 for clarity, grammatical structure, and meaning of the sentence.	European Union
306.	66	Substantive	These seeds are planted under conditions that <u>reduce the likelihood of</u> <del>prevent</del> their release into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.	Delete "prevent" and add " reduce the likelihood" because it is more appropriate as not certain it would prevent their release into the environment of the PRA area.	Canada
307.	66	Substantive	These seeds are planted under conditions that prevent their release into the environment of the PRA area. <u>For this category, NPPOs should apply phytosanitary measures that are proportional to the pest risk identified. The required conditions should be developed by the NPPO of the importing country.</u>	• Replacements of the last sentence with a new sentence, the reason being that there are still risks in terms of movement of seeds.	South Africa
308.	66	Substantive	<del>These seeds are planted under conditions that prevent their release into the environment of the PRA area. The required conditions should be developed by</del>	Ammalgamated	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
309.	66	Technical	<del>the NPPO of the importing country.</del> <del>These seeds are planted under conditions that prevent their release into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.</del>	Incorporated in paragraph 65	EPPO, Georgia, European Union, Serbia, Algeria
310.	66	Technical	These seeds are planted under conditions that prevent <u>the introduction of quarantine pests and for this reason may pose a medium pest risk.</u> <del>their release into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.</del>	In this section we are assessing the level of pest risk in relation to the purpose of seeds (para. 57), we are not evaluating the phytosanitary measures, which may be determined during pest risk management stage of PRA	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
311.	67	Editorial	1. <u>2.</u> Seeds for planting under <u>quarantine</u> <del>restricted</del> conditions with the intention of release.	More appropriately, these are quarantine conditions. This is the second category.	Australia
312.	67	Substantive	1. <del>Seeds for planting under restricted conditions with the intention of release.</del> (2) <u>Seeds planted for planting under controlled conditions with the intention of release.</u>	Proposed rearrangement of para 58 - 72 for more clarity.	Singapore, China, Korea, Republic of, Ghana, Belize
313.	67	Substantive	1. <del>Seeds for planting under restricted conditions with the intention of release.</del> (2) <u>Seeds for planting under controlled conditions with the intention of release.</u>	Proposed rearrangement of para 58 - 72 for more clarity.	Thailand
314.	67	Substantive	(2) Seeds <del>planted for planting</del> under <del>restricted</del> <u>controlled</u> conditions with the intention of release.	For greater clarity of pest risk associated with seed use.	Japan
315.	67	Technical	1. <del>Seeds for planting under restricted conditions with the intention of release.</del>	There are not seeds for planting under restricted conditions with the intention of release, except seeds imported for genetic resources/gene banks destined to another gene bank, that is the exchange of genetic resources. In addition some seeds included in this item can be included in previous item (seeds imported for research) and some to the following item	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
316.	68	Editorial	<del>Such</del> These seeds are imported under <u>requirements</u> for post-entry quarantine, with treatment as a phytosanitary measure, and are <del>restricted</del> <u>limited</u> to <u>being grown</u> <del>th</del> in protected environments (e.g. glasshouses, growth chambers) or <u>in isolated</u> <del>with fields</del> <u>isolation</u> . Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for genetic resources/gene banks, and seeds <u>used as for</u> breeding <u>programmes</u> <del>material</del> .	Better wording and better readability.	EPPO, Georgia, Norway, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
317.	68	Editorial	<del>Such</del> These seeds are imported under requirements for post-entry quarantine, with treatment as a phytosanitary measure, and are <del>restricted</del> limited to <del>being grown</del> th in protected environments (e.g. glasshouses, growth chambers) or <del>in isolated</del> with fields isolation. Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for <del>genetic resources</del> gene banks, and seeds <del>used as</del> for breeding <del>programmes</del> material.	Better wording and better readability.	European Union
318.	68	Substantive	<del>These seeds are imported under post-entry quarantine, with treatment as a phytosanitary measure, and are limited to growth in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds</del> Seeds are imported for evaluation and potential release, seeds imported for research, <del>seeds imported for genetic resources/gene</del> germplasm banks, and <del>seeds</del> as breeding material.	As per proposed rearrangement of para 58 - 72 and to cover seed germplasm.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
319.	68	Substantive	These seeds are imported under post-entry quarantine, <del>with treatment as a phytosanitary measure</del> , and are limited to growth in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for genetic resources/gene banks, and seeds as breeding material.	Delete "with treatment as a phytosanitary measure" as treatment is not typically undertaken in PEQ.	Canada
320.	68	Substantive	<del>These seeds are imported under post-entry quarantine, with treatment as a phytosanitary measure, and are limited to growth in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds</del> Seeds are imported for evaluation, and potential release, seeds imported for research, <del>seeds imported for genetic resources/gene</del> germplasm banks, and <del>seeds as</del> as breeding material.	For greater clarity of pest risk associated with seed use.	Japan
321.	68	Substantive	These seeds are imported under post-entry quarantine, <del>with treatment as a phytosanitary measure</del> , and are <del>restricted</del> limited to <del>be grown</del> th in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for genetic resources/gene banks, and seeds as breeding material.	Deletion of "with treatment as a phytosanitary measure" and "limited" and addition of "restricted" the reason being that treatment of seeds is not a common measure during post entry quarantine, therefore plants are only treated, if required.	South Africa
322.	68	Technical	These seeds are imported under post-entry quarantine, <del>with treatment as a phytosanitary measure</del> , and are limited to growth in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for genetic resources/gene banks, and seeds as breeding material.	A treatment is not always needed, it is just an option and not necessarily linked to post-entry.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
323.	68	Technical	These seeds are imported under post-entry quarantine <del>conditions</del> , <del>with treatment as a phytosanitary measure</del> , and are <del>limited</del> <del>restricted</del> to <del>being grown</del> growth in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for genetic resources/gene banks, and	Treatment of seeds is not a common measure during post-entry quarantine. Only the resulting plants are treated, if required.	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			seeds as breeding material.		
324.	68	Technical	These seeds are imported under post-entry quarantine, with treatment as a phytosanitary measure, and are limited to growth in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for genetic resources/gene banks, and seeds as breeding material.	Regarding: with treatment as a phytosanitary measure... not specific to this case	ISTA*
325.	68	Technical	<del>These seeds are imported under post-entry quarantine, with treatment as a phytosanitary measure, and are limited to growth in protected environments (e.g. glasshouses, growth chambers) or with field isolation. Examples include seeds for evaluation and potential release, seeds imported for research, seeds imported for genetic resources/gene banks, and seeds as breeding material.</del>	See Para 67.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
326.	69	Editorial	<del>Such</del> These seeds are planted under conditions that limit or prevent the introduction of regulated pests into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.	Better word.	EPPO, Georgia, European Union, Serbia, Algeria
327.	69	Substantive	These seeds are planted under conditions that <u>may</u> limit or prevent the introduction of regulated pests into <del>the environment of</del> the PRA area. <u>For this category, the NPPOs should apply phytosanitary measures that are proportional to the pest risk identified. The required conditions should be developed by the NPPO of the importing country.</u>	Addition of “may” and deletion of “the environment” in order to make the sentence grammatically correct. Replacement of the last sentence with the new sentence the reason being that there are still risks in terms of movement of seeds and also to emphasize the fundamental principles of pest risk analysis.	South Africa
328.	69	Technical	These seeds are planted under conditions that limit or prevent the introduction of <del>quarantine regulated</del> pests into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.	Introduction is only relevant for quarantine pests not for RNQPs.	EPPO, Georgia, Norway, Serbia, Algeria
329.	69	Technical	These seeds are planted under conditions that limit or prevent the introduction of regulated pests into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.  <u>Seeds imported under post-entry quarantine conditions can be dealt with in two ways; a seed sample is planted and if the resulting plants are found to be disease free, the remainder of the shipment is allowed entry for general planting. Alternately, only the progeny of healthy plants can be used for general release.</u>	The text provides guidance on dealing with seeds imported under post-entry quarantine conditions.	ISF*
330.	69	Technical	<del>These seeds are planted under conditions that limit or prevent the introduction of regulated pests into the environment of the PRA area. The required conditions should be developed by the NPPO of the importing country.</del>	See Para 67.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
331.	69	Technical	These seeds are planted under conditions that limit or prevent the introduction of <del>quarantine regulated</del> pests into the environment of the PRA area. <del>The required conditions should be developed by the NPPO of the importing country.</del>	Introduction is only relevant for quarantine pests not for RNQPs. Obligations or possibilities for the importing country need not be specified in this standard.	European Union
332.	70	Substantive	<u>(3) Seeds for planting planted in the broader environment -</u>	For greater clarity of pest risk associated with seed use.	Japan
333.	70	Technical	1. Seeds for planting <u>under field conditions.</u>	To clarify	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
334.	71	Editorial	<del>Such</del> <u>This class of</u> seeds includes seeds imported with the intent of <u>being planted without restriction in the PRA area.</u> <del>ing them in the broader environment.</del>	Better wording.	EPPO, Georgia, Norway, Serbia, Algeria
335.	71	Editorial	<del>Such</del> <u>This class of</u> seeds includes seeds imported with the intention of <u>being planted without restriction in the PRA area.</u> <del>ing them in the broader environment.</del>	Better wording.	European Union
336.	71	Editorial	This class of seeds includes seeds imported with the intent of planting them in the <u>PRA area</u> <del>broader environment.</del>	Consistent wording with paragraph [64] change.	Australia
337.	71	Substantive	<del>This class of seeds includes seeds imported with the intent of planting them in the broader environment.</del>	Redundant after rearrangement of para 58 - 72.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
338.	71	Substantive	<del>This class of seeds includes seeds imported with the intent of planting them in the broader environment.</del>	For greater clarity of pest risk associated with seed use.	Japan
339.	71	Substantive	<del>These</del> <u>This class of</u> seeds includes seeds imported with the intent of planting <u>into the PRA area</u> <del>them in the broader environment.</del>	Deletion of "This class of" and replace with "These" and deletion of "them in the broader environment" and replace with "into the PRA area" for contextual clarity.	South Africa
340.	71	Technical	<del>These is class of</del> seeds <u>are</u> <del>includes seeds</del> imported <u>for</u> <del>with the intent of</del> planting <u>under field conditions</u> <del>them in the broader environment.</del>	The term class was deleted because it is specific term related to systems of seed production and not to this draft.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
341.	72	Substantive	<del>Because t</del> <u>These</u> seeds are generally intended for unrestricted release into the <u>environment of the PRA area.</u> <del>, this class of seeds presents the highest potential pest risk. The need for suitable phytosanitary measures should be</del>	Deletion and addition of the highlighted wording because there is still risks in terms of movement of seeds.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>considered. For this category, NPPOs should apply phytosanitary measures that are proportional to the pest risk identified.</del>		
342.	72	Technical	<del>Because these seeds intended for unrestricted release into the environment of the PRA area</del> are generally <del>intended for unrestricted release into the environment of the PRA area, this class of seeds</del> presents the highest potential pest risk <del>for both quarantine pests and RNQPs. Accordingly, the NPPO of the importing country may require more stringent measures against quarantine pests than for any of the above intended uses. Specific tolerances for RNQPs may be established. The need for suitable phytosanitary measures should be considered.</del>	To also include RNQPs and the possibility to set tolerances for them.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
343.	72	Technical	<del>Because these seeds are generally intended for unrestricted release into the environment of the PRA area, this class of seeds</del> presents the highest potential pest risk. <del>The need for suitable phytosanitary measures should be considered.</del>	First sentence because Paras 70 and 71 already mention that these seeds are for planting. The term class was deleted because it is specific term related to systems of seed production and not to this draft. Last sentence deleted because we are assessing pest risk, if during pest risk assessment, a high risk is determined, PRA will continue to identify pest risk management options that are the basis of phytosanitary measures	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
344.	73	Substantive	<del>The phytosanitary measures in section 2 seem to be out-of-order.</del> <b>2. Phytosanitary Measures</b>	Adjust the sequence of the phytosanitary measures according to seeds production procedures.	China
345.	73	Substantive	<del>21.3. Phytosanitary Measures</del> <b>Pest Risk Management</b>	Section 2 of the draft under consultation mixes information to be considered in the Pest Risk Management stage of the PRA (e.g. seeds certification schemes, resistant varieties) with phytosanitary measures to minimize pest risk (PFA, Post-entry quarantine). We propose to separate both including an item 1.3 to describe the information to be considered in pest risk management stage of PRA. On the other hand, phytosanitary measures are included in a separate section.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
346.	74	Substantive	Phytosanitary measures should be used to prevent the introduction of <del>regulated quarantine</del> pests identified during the PRA and in accordance with the requirements outlined in section 1 of this standard.	Replacement of the word “quarantine” with “regulated”. The terminology as defined in ISPM 5. 2013. Glossary of phytosanitary terms includes both quarantine and regulated non-quarantine pests.	South Africa
347.	74	Technical	Phytosanitary measures should be used to prevent the introduction of quarantine pests <del>and control the regulated non-quarantine pests</del> identified during the PRA	It's the same with the Para 47. And “regulated pests” in Para. 64 covers “regulated non-	China



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			and in accordance with the requirements outlined in section 1 of this standard.	quarantine pests”, which is an important concern to international movement of seeds.	
348.	74	Technical	Phytosanitary measures, <u>proportionate to the actual pest risk</u> , should be used to prevent the introduction of quarantine pests <u>and to ensure that the tolerance levelsof RNQPs are met, as</u> identified <u>through</u> <del>during the PRA and in accordance with the requirements outlined in section 1 of this standard.</del>	To explicitly include RNQPs.	EPPO, Georgia, Serbia
349.	74	Technical	Phytosanitary measures should be used to prevent the introduction of <u>regulated</u> <del>quarantine</del> pests identified during the PRA and in accordance with the requirements outlined in section 1 of this standard.	More comprehensive and to be in consistency with the other paragraphs of the draft ISPM (para 47)	NEPPO, Bahrain, Morocco, Algeria
350.	74	Technical	<u>Single P</u> <del>phytosanitary</del> measures <u>or measures in combination in a systems approach (ISPM 14: 2001)</u> should be used to prevent the introduction of quarantine pests identified during the PRA and in accordance with the requirements outlined in section 1 of this standard.	A systems approach is widely used by the seed industry and it is recognised in ISPM 14.	ISF*
351.	74	Technical	Phytosanitary measures should be <u>applied</u> <del>used</del> to prevent the introduction <u>and spread</u> of <u>quarantine regulated</u> pests identified during the PRA and in accordance with the requirements outlined in section 1 of this standard.	Modified because RNQP are also relevant in the international movement of seeds.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
352.	74	Technical	Phytosanitary measures, <u>proportionate to the actual pest risk, applied singly or in combination in a systems approach according to ISPM 14:2004</u> , should be used to prevent the introduction of quarantine pests <u>and to ensure that the tolerance levelsof RNQPs are met, as</u> identified <u>through</u> <del>during the PRA and in accordance with the requirements outlined in section 1 of this standard.</del>	To explicitly include RNQPs.	European Union
353.	74	Technical	Phytosanitary measures, <u>proportionate to the actual pest risk</u> , should be used to prevent the introduction of quarantine pests <u>and to ensure that the tolerance levels of RNQPs are met, as</u> identified <u>through</u> <del>during the PRA and in accordance with the requirements outlined in section 1 of this standard.</del>	To explicitly include RNQPs.	Norway
354.	75	Substantive	<b>2.1.3.1 Seed certification schemes</b>	See comment in Para 73. Measures included in Seed Certification Schemes may be considered for pest risk management.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
355.	75	Substantive	<b>2.1 Seed certification schemes</b>	A seed certification scheme is not a phytosanitary measure.	Australia
356.	76	Editorial	Certain elements of a seed certification scheme may already include measures that may be recognized as phytosanitary measures, including <u>purity</u> testing <del>for the presence of weed seeds.</del>	If seeds are tested for physical purity as part of a seed certification scheme, the results should be taken into account to avoid duplication/repetition.	ISF*
357.	76	Editorial	Certain elements of a seed certification scheme may <u>have an effect on the phytosanitary risk of that seed. Some of these elements are</u>	For clarification	United States of

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>eady include measures that</del> may be recognized as phytosanitary measures, <del>including for example</del> testing for the presence of weed seeds.		America
358.	76	Substantive	Certain elements of a seed certification scheme may already include measures that may be recognized as phytosanitary measures, including <u>inspection or</u> testing for the presence of <u>pests or</u> weed seeds.	Inspection is also an important aspect of certification schemes.	EPPO, Georgia, European Union, Norway, Serbia
359.	76	Substantive	Certain elements of a seed certification scheme may already include measures that <del>should</del> <del>may</del> be recognized as phytosanitary measures, including testing for the presence of weed seeds.	The word "may" should be replaced with "should" to intensify the concern on measures which is recognized as the phytosanitary measures.	Thailand
360.	76	Substantive	Certain elements of a seed certification scheme <u>(such as testing for the presence of weed seed)</u> may already <del>include measures that may</del> be recognized as phytosanitary measures <u>and must be assessed on a case-by-case basis, including testing for the presence of weed seeds.</u> <u>Seed certification may be useful measure when used in combination with other phytosanitary measures as part of systems approach.</u>	Replacement of the deleted sentences with the new sentences, for contextual clarification between 2.1 and 2.2 and to focus on the use of fundamental principles of pest risk analysis.	South Africa
361.	76	Substantive	Certain elements of a seed certification scheme may already include measures that may be recognized as phytosanitary measures, including testing for the presence of weed seeds <u>and some pests.</u>	Certain pests are also included	OIRSA
362.	76	Technical	Certain elements of a seed certification scheme may already include <del>measures procedures</del> that may be recognized <u>by NPPO</u> as phytosanitary measures, including testing for the presence of weed seeds.	To clarify the roles and responsibilities	NEPPO, Bahrain, Morocco, Algeria
363.	76	Technical	Certain elements of a seed certification scheme may already include measures <del>that may be recognized as phytosanitary measures, including related to potential regulated pests for the importing country that should be considered in pest risk management (e.g. testing for the presence of weed seeds).</del> <u>These schemes should ensure seed traceability.</u>  <u>Information about seed crop and post-harvest management practices is normally requested to initiate PRA and is provided by the NPPO of the exporting country. Seed production practices that may be considered for pest risk management may include pre-planting measures (e.g. crop rotation, use of resistant or tolerant varieties, use of tested healthy planting material, soil treatments); pre-harvest measures (e.g. parent plant testing, pest monitoring, field inspection, sanitation, crop treatment, protected conditions); harvest and post-harvest measures (e.g. harvest methodology, use of disinfectants during seed extraction, seed cleaning, seed storage, seed testing, seed treatment, seed packing).</u>	If seed certification schemes include measures for regulated pests of the importing country this should be taken into account during pest risk management stage of PRA in order to avoid unnecessary measures. New paragraph containing a summary of the concepts of Para 89 (Measures for Seed Production) and described in Paragraphs 93 to 115. Only those measures relevant for pest risk management are included.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
364.	77	Editorial	<b>2.2 Resistant varieties</b> <u>delete paragraph 77 to 80</u>	The concept of resistant varieties will be more approndi examination object before to consider in the PRA.	Algeria
365.	77	Substantive	<del>2.2 Resistant varieties</del> <u>2.2 Tolerant varieties</u>	The term - resistant" is questionable & hence Tolerant" is proposed instead.	Singapore, China, Korea, Republic of, Ghana, Belize
366.	77	Substantive	<b>2.2 <del>Resistant</del>Less susceptible varieties</b>	The term of resistance may have been changed to less susceptible?	Indonesia
367.	77	Substantive	<b>2.2 <u>Tolerant</u><del>Resistant</del> varieties</b>	Replace "Resistant" with "Tolerant" for accuracy. Resistance implies 100% protection from the pest when in reality biological systems are rarely 100% effective. 'Tolerance' implies a level of protection less than 100%.	Canada
368.	77	Substantive	<del>2.1.3.2</del> <b>2.2 Resistant varieties</b>	See comment in Para 73.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
369.	77	Substantive	<b>2.2 <u>Tolerant</u><del>Resistant</del> varieties</b>	plants can have a certain level of tolerance to a pest but not be resistant. Factors such as plant health affect the level of tolerance a plant has.	Australia
370.	78	Editorial	Modern breeding programmes <u>may produce</u> <del>result</del> in plant varieties with <del>multiple</del> resistance to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest exists, importing countries should consider this resistance in the PRA for the importation of seeds.	Better wording	EPPO, Georgia, Norway, Serbia
371.	78	Editorial	Modern breeding programmes result in plant varieties with multiple resistance <u>s</u> to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest exists, importing countries should consider this resistance in the PRA for the importation of seeds.	Grammar	United States of America
372.	78	Editorial	Modern breeding programmes <u>may produce</u> <del>result</del> in plant varieties with <del>multiple</del> resistance to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest exists, <u>the</u> importing country <u>ies</u> should consider this resistance in the PRA for the importation of seeds.	Better wording	European Union
373.	78	Editorial	Modern breeding programmes result in plant varieties with multiple resistance to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest exists, importing countries <u>may</u> <del>should</del> consider this resistance in the PRA for the importation of seeds.	Deletion of "should" and addition of "may" the reason being "should" is mandatory.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
374.	78	Editorial	Modern breeding programmes result in plant varieties with multiple <del>tolerances</del> resistance to pests, which may include <del>tolerance</del> resistance to regulated pests. When confirmed resistance to a regulated pest exists, importing countries should consider this <del>tolerance</del> resistance in the PRA for the importation of seeds.	tolerance rather than resistance.	Australia
375.	78	Substantive	<del>Modern breeding programmes result in plant varieties with multiple resistance to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest exists, importing countries should consider this resistance in the PRA for the importation of seeds.</del>	Move to Section 1.2	Singapore, China, Korea, Republic of, Ghana, Belize
376.	78	Substantive	Modern breeding programmes result in plant varieties with <del>tolerance to</del> multiple resistance to pests, which may include <del>tolerance</del> resistance to regulated pests. When confirmed <del>tolerance</del> resistance to a regulated pest exists, importing countries should consider this <del>tolerance</del> resistance in the PRA for the importation of seeds.	Global change from "resistance" to "tolerance" as per comment in Para. 77.	Canada
377.	78	Substantive	Modern breeding programmes result in plant varieties with multiple resistance to pests, which may include resistance to regulated pests, <u>in particular for regulated non quarantine pest</u> . When confirmed resistance to a regulated pest exists, importing countries should consider this resistance in the PRA for the importation of seeds.	For this kind of pests especially, because they may be "seed" transmitted and are more feasible for accepting.	OIRSA
378.	78	Substantive	Modern breeding programmes result in plant varieties with multiple resistance to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest exists, importing countries <del>may</del> should consider this resistance in the PRA for the importation of seeds.  <u>Pest tolerance may be a useful measure when used in combination with phytosanitary measures as a systems approach. The use of pest tolerance as a phytosanitary measure must be considered on a case by case basis.</u>	It is important to qualify how pest tolerance could be considered in a PRA.	Australia
379.	78	Technical	Modern breeding programmes result in plant varieties with multiple resistance to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest <u>is such hat a resistant variety is not infested by the pest</u> <del>exists</del> , importing countries should consider this resistance in the PRA <u>as a phytosanitary measure</u> <del>for the importation of seeds</del> .	Only full resistance should be considered.	EPPO, Georgia, European Union, Serbia
380.	78	Technical	Modern breeding programmes result in plant varieties with multiple resistance <u>s</u> to pests, which may include resistance to regulated pests. When confirmed resistance to a regulated pest exists, importing countries should consider this resistance <u>as an alternative phytosanitary measure</u> in the PRA for the importation of <u>these</u> seeds.	Considering pest resistance as a phytosanitary measure can be valid only for varieties with confirmed and adequate resistance. Such a measure cannot be generic for all seeds of a species.	ISF*
381.	78	Technical	Modern breeding programmes result in plant varieties with multiple resistance to pests, which may include resistance to regulated pests. When confirmed	Only full resistance should be considered.	Norway

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			resistance to a regulated pest <u>is such that a resistant variety is not infested by the pest</u> <del>exists</del> , importing countries should consider this resistance in the PRA <u>as a phytosanitary measure</u> <del>for the importation of seeds</del> .		
382.	79	Editorial	<del>A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.</del>  <u>Pest tolerance may be a useful measure when used in combination with other phytosanitary measures as a system approach. The use of pest tolerance as a phytosanitary measure must be assessed on a case-by-case basis.</u>	Proposed replacement due to change of term from resistant to tolerance.	Singapore, China, Korea, Republic of, Belize
383.	79	Editorial	A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may <del>affect</del> <u>impact</u> the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure <del>should</del> <u>must</u> be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.	Better wording	EPPO, Georgia, European Union, Serbia
384.	79	Editorial	A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures <del>as a system in an integrated pest management</del> approach.	The term "system approach" may be more properly to replace the phrase "in an integrated pest management" in the last sentence as system approach has already been defined in ISPM 5.	Thailand
385.	79	Editorial	A plant variety's level of resistance to different regulated pests may vary depending on the resistant <del>ee</del> genes present. Resistant <del>ee</del> genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.	Grammatical correctness	Ghana
386.	79	Substantive	A plant variety's level of <del>tolerance</del> <u>resistance</u> to different regulated pests may vary depending on the <del>tolerance resistance traits</del> <u>genes</u> present <u>in the plant</u> .	1. Global change in the standard from "resistance" to "tolerance" because resistance implies 100%	Canada

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><del>The tolerance traits</del>Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of <del>tolerance</del>resistance. Therefore, the <del>characterization</del>use of pest <del>tolerance</del>resistance as a phytosanitary measure <del>may</del> must be assessed on a case-by-case basis. Pest <del>tolerance</del>resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.</p> <p><u>A consideration with respect to tolerant varieties is that a given pest may be present in the seed but because the variety is tolerant the pest may not persist and may not be a pest risk or in other cases the tolerant seed may still be a vector for the pest and pose a pest risk.</u></p>	<p>protection whereas tolerance implies less than 100%. 2. Replace "genes" with "traits" as tolerance may be the result of many factors, perhaps not easily characterized as 'genes'. 3. A few suggestions to clarify this paragraph, especially with the use of the word "must" replaced by "may". 4. A new paragraph has been added below paragraph [79] to explain a difficulty with using tolerance as a phytosanitary measure.</p>	
387.	79	Substantive	<p><del>A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance.</del> Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. <u>Seed certification</u><del>Pest resistance</del> may be a useful measure when used in combination with other phytosanitary measures <u>as part of systems</u> <del>in an integrated pest management</del> approach.</p>	<ul style="list-style-type: none"> <li>• Deletion of the first sentence due to fact that biological information (i.e. race, strains, biotypes, pathotypes) will be used during the PRA process.</li> <li>• Deletion of "an integrated pest management" and addition of "systems approach", for the use of appropriate IPPC terminology. Integrated Pest Management is part of the systems approach.</li> </ul>	South Africa
388.	79	Substantive	<p>A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis, <u>particularly for quarantine pests</u>. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.</p>	For clarify	OIRSA
389.	79	Technical	<p>A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance <u>and a pest may be present asymptotically</u>. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.</p>	That tolerant variety can host a pest.	New Caledonia*
390.	79	Technical	<p>A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of</p>	"Integrated approach" is unnecessary to mention here and may be confusing.	EPPO, Georgia, Serbia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures <del>in an integrated pest management approach.</del>		
391.	79	Technical	A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some <del>specific</del> races <del>or strains</del> or biotypes <del>or pathotypes</del> of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.	It is important that races / strains / biotypes / pathotypes are correctly identified.	ISF*
392.	79	Technical	A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance <del>as a phytosanitary measure must be</del> <u>should be</u> assessed <del>on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in an integrated pest management approach.</del>	Resistance is not a phytosanitary measure, but a factor to be considered for pest risk management.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
393.	79	Technical	A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some <del>specific</del> races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures <del>in an integrated pest management approach.</del>	'Some races' is too general, by writing specific races it is better expressing that it are specific races that resistance is valid for. "Integrated approach" is unnecessary to mention here and may be confusing.	European Union
394.	79	Technical	A plant variety's level of resistance to different regulated pests may vary depending on the resistance genes present. Resistance genes may be effective against all or some races or biotypes of the targeted pest but the emergence of new races or biotypes may impact the level of resistance. Therefore, the use of pest resistance as a phytosanitary measure must be assessed on a case-by-case basis. Pest resistance may be a useful measure when used in combination with other phytosanitary measures in <del>an integrated pest management</del> <u>systems</u> approach.	This is not integrated pest management. In phytosanitary terms, this is a systems approach.	Australia
395.	80	Editorial	Appendix 1 of this standard lists <del>some a</del> references on the use of resistant varieties.	Only one reference in Appendix 1	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
396.	80	Substantive	Appendix 1 of this standard lists some references on the use of <del>tolerant</del> resistant varieties.	Global change from "resistant" to "tolerant" as per comment in Para. 77.	Canada
397.	80	Technical	<p>Appendix 1 of this standard lists some references on the use of resistant varieties.</p> <p><u>NPPOs of importing countries normally conduct PRA for seeds by species. The NPPO of the exporting country should make a specific request to the NPPO of the importing country when interested in the conduction of the PRA for specific resistant varieties.</u></p> <p><u>1.3.3 Seed treatments</u></p> <p><u>Seed treatments include a variety of techniques that may involve, but are not limited to:</u></p> <ul style="list-style-type: none"> <li><u>• Pesticides (fungicides, insecticides, nematocides and bactericides).</u></li> <li><u>• Disinfectants are generally used against bacteria and viruses. Disinfection may take place during various steps in seed processing (e.g. seed extraction, seed priming1or during a dedicated disinfection process.</u></li> <li><u>• Physical treatments (e.g. dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep freezing .</u></li> <li><u>• Biological treatments based on different modes of action, such as antagonism, competition and induced resistance.</u></li> </ul>	<p>Sentence added to provide further guidance to NPPOs on the consideration of resistant varieties during Pest Risk Management stage of PRA. New Section 1.3.3 added. Paragraphs 83 and 84, and part of the content of Appendix 2 were moved to this Section in order to include seed treatments during seed production to be considered in Pest Risk Management stage of the PRA. These seed treatments should not be confused with treatments as phytosanitary measures and a new section on phytosanitary treatments is included.</p>	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
398.	81	Substantive	<p><u>2. Phytosanitary Measures</u></p> <p><u>2.1 Consignment inspection and testing for freedom from a pest</u></p> <p><u>Sample size should be adequate to give an acceptable probability of detecting the pest.</u></p>	<p>Phytosanitary Measures that could be required for Pest Risk Management are described here as a separated section (see comment in Para 73). Sections 2.1 and 2.2 were added because these are phytosanitary measures commonly applied in the international movement of seeds and should be included in the draft. Areas of Low Pest Prevalence could also be required.</p>	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><b>2.2 Field inspection for freedom from a pest</b></p> <p><u>Inspection of plants in the field may be a useful phytosanitary measure for some regulated pests known to produce visible symptoms. In case seed is harvested from a field with visual symptoms of a pest, it should be tested if justified according to PRA.</u></p> <p><b>2.3 Pest free areas, <u>areas of low pest prevalence</u>, pest free places of production and pest free production sites</b></p>		
399.	81	Substantive	<b>2.3 Pest free areas, <u>area of low pest prevalence</u>, pest free places of production and pest free production sites</b>	Addition of "areas of low pest prevalence" the reason being that it is a relevant measure used in a systems approach as defined on ISPM 22	South Africa
400.	82	Substantive	Pest free areas, <u>area of low pest prevalence</u> , pest free places of production and pest free production sites should be recognized, established and maintained in accordance with ISPM 4:1995, <del>and</del> ISPM 10:1999 <u>and ISPM 22: 2005</u> .	Addition of "areas of low pest prevalence" and "ISPM 22: 2005" the reason being that these is relevant measures used in a systems approach as defined on ISPM 22.	South Africa
401.	82	Substantive	Pest free areas, pest free places of production and pest free production sites should be recognized, established and maintained in accordance with ISPM 4:1995, <u>ISPM 29: 2007</u> and ISPM 10:1999.	Other relevant ISPM	OIRSA
402.	82	Technical	Pest free areas, pest free places of production <del>or</del> and pest free production sites should be recognized, established and maintained in accordance with ISPM 4:1995 and ISPM 10:1999, <u>may provide an effective phytosanitary measure</u> .	Explaining that those phytosanitary measures may be relevant for seeds.	EPPO, Georgia, Serbia
403.	82	Technical	Pest free areas, pest free places of production and pest free production sites should be recognized, established and maintained in accordance with <u>ISPM 29:2007</u> , ISPM 4:1995 and ISPM 10:1999.	The ISPM dealing with recognition (ISPM 29) was missing	NEPPO, Bahrain, Morocco, Algeria
404.	82	Technical	Pest free areas, <u>areas of low pest prevalence</u> , pest free places of production and pest free production sites should be recognized, established and maintained in accordance with ISPM 4:1995, <del>and</del> ISPM 10:1999, <u>ISPM 22:2005 and ISPM 29:2007</u> .	Relevant ISPM 29 (Recognition) and ISPM 22 were added as references.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
405.	82	Technical	Pest free areas, pest free places of production <del>or</del> and pest free production sites <del>should be</del> recognized, established and maintained in accordance with ISPM 4:1995 and ISPM 10:1999, <u>may provide an effective phytosanitary measure</u> .	Explaining that those phytosanitary measures may be relevant for seeds.	European Union
406.	82	Technical	Pest free areas, pest free places of production <del>or</del> and pest free production sites <del>should be</del> recognized, established and maintained in accordance with	Explaining that those phytosanitary measures may be relevant for seeds.	Norway

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			ISPM 4:1995 and ISPM 10:1999, <u>may provide an effective phytosanitary measure.</u>		
407.	83	Technical	<b>2.4 Phytosanitary Treatments</b>	This section was included as another phytosanitary measure that could be required.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
408.	84	Editorial	Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, <u>pesticides</u> <del>fungicides, insecticides, nematocides</del> and chemical disinfectants.	EWG RU Bykovo: clarity, simplicity	EPPO, Georgia, Serbia
409.	84	Editorial	Seed treatments <u>may</u> include a variety of techniques <del>that may involve, but are not limited to, such as</del> heat, hot water, fungicides, insecticides, nematocides and chemical disinfectants.	Better wording.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
410.	84	Editorial	Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, <u>pesticides</u> <del>fungicides, insecticides, nematocides</del> and chemical disinfectants.	Clarity, simplicity.	European Union
411.	84	Editorial	Seed treatments include a variety of techniques <u>e.g.</u> <del>that may involve, but are not limited to,</del> heat, hot water, fungicides, insecticides, nematocides and chemical disinfectants.	The words 'may involve' make 'but are not limited to, unnecessary. Delete.	Australia
412.	84	Substantive	Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, fungicides, <u>bactericides</u> , insecticides, nematocides and chemical <u>or biological treatments or</u> disinfectants.	To provide more examples.	Singapore, China, Thailand
413.	84	Substantive	Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, fungicides, insecticides, nematocides and chemical <u>or biological</u> disinfectants.	provide more examples	Korea, Republic of, Ghana, Belize
414.	84	Substantive	Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, fungicides, insecticides, nematocides and chemical disinfectants <u>or biological treatments</u> .	Addition of "or biological treatments" the reason being that description of treatments in Appendix 2 include biological treatments.	South Africa
415.	84	Substantive	<u>Some seed treatments may be used as phytosanitary measures as deemed by the NPPO of the importing country.</u> Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, fungicides, insecticides, nematocides and chemical disinfectants.	To unify ideas related	OIRSA
416.	84	Technical	<u>Certain s</u> Seed treatments <u>any be used as a phytosanitary measure.</u> Seed <u>traetments</u> include a variety of techniques that may involve, <u>e.g.</u> <del>but are not limited to,</del> heat, hot water, <u>steam, pesticides, biological agenst</u> <del>fungicides, insecticides, nematocides</del> and chemical disinfectants.	As a more logical order, combining 84 and 85 and giving more examples to be not too restrictive.	EPPO, Georgia, Serbia
417.	84	Technical	Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, fungicides, insecticides, nematocides and	Appendix 2 includes biological treatments in the description of different kinds of treatments.	ISF*



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			chemical <u>or biological treatments or</u> disinfectants.		
418.	84	Technical	<u>Phytosanitary</u> <del>Seed</del> treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, fungicides, insecticides, nematocides and chemical disinfectants.	As per comment in paragraph 83.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
419.	84	Technical	<u>Certain s</u> <del>Seed</del> treatments <u>may be used as a phytosanitary measure.</u> <u>Seed treatments</u> include a variety of techniques that may involve, <u>e.g. but are not limited to,</u> heat, hot water, <u>steam, pesticides, biological agents</u> <del>fungicides, insecticides, nematocides</del> and chemical disinfectants.	As a more logical order, combining 84 and 85 and giving more examples to be not too restrictive.	European Union
420.	84	Technical	Seed treatments include a variety of techniques that may involve, but are not limited to, heat, hot water, <u>pesticides</u> <del>fungicides, insecticides, nematocides</del> and chemical disinfectants.	For synthesizing	OIRSA
421.	85	Editorial	<del>Some s</del> Seed treatments may be used as phytosanitary measures.	Sentence formation in line with the previous.	ISF*
422.	85	Editorial	<del>Some</del> seed treatments may be used as phytosanitary measures.	Deletion of "some" the reason being that phytosanitary measures will determine the treatment to be used.	South Africa
423.	85	Substantive	Some seed treatments <u>should</u> <del>may</del> be used as phytosanitary measures.	Should is more suitable term and gives more emphasis to phytosanitary measures	NEPPO, Bahrain, Morocco, Algeria
424.	85	Substantive	Some seed treatments may be used as phytosanitary measures.  <u>If a chemical seed treatment is required as a (mandatory) phytosanitary measure and this treatment is not compliant with standards for organic seeds, an alternative that is compliant should be permitted.</u>	(new sentence added) Setting a mandatory requirement for seed treatments impedes the import of seeds for producers of organic produce. So an alternative should be offered for that market.	ISF*
425.	85	Substantive	<del>Some seed treatments may be used as phytosanitary measures.</del>	Due to text relocation	OIRSA
426.	85	Technical	<del>Some seed treatments may be used as phytosanitary measures.</del>	More logically combined with paragraph 84.	EPPO, Georgia, European Union, Serbia
427.	85	Technical	Some seed treatments may be used as phytosanitary measures.  <u>As products and Active Ingredients may not be authorised for use in all countries of production, export and re-export, it is recommended that only the required type of treatment be specified in phytosanitary requirements. If a treatment rate is specified it should be the one recommended by the manufacturer.</u>	(another sentence added below the new sentence above) If requirements for seed treatments are detailed to the level of prescribing the product, Active Ingredient and/or the rate of application, international movement of seeds is seriously hindered as countries have very different authorizations for Active Ingredients for seed	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				treatments. Such requirements should not become a technical barrier for trade and so the requirement should be formulated in as generic a manner as possible, e.g. 'treatment of seeds by an effective fungicide'.	
428.	85	Technical	Some seed treatments may be used as phytosanitary measures.	Providing they are 100% effective against the pest?	ISTA*
429.	86	Editorial	Appendix 2 <del>of this standard</del> provides an overview of <u>types of available</u> treatments for <u>various</u> <del>each</del> pest <u>groups</u> <del>category</del> .	Better wording covering the contents of Appendix 2 better.	EPPO, Georgia, European Union, Serbia, Algeria
430.	86	Editorial	Appendix 2 of this standard provides an overview of available <u>types of</u> treatments for each pest category.	Clarification of the text.	ISF*
431.	86	Editorial	Appendix 2 of this standard provides an overview of <u>some</u> available treatments for each pest category.	There may be more treatments available.	Australia
432.	86	Substantive	<del>Appendix 2 of this standard provides an overview of available treatments for each pest category.</del>	Redundant.	Singapore, China, Korea, Republic of, Ghana, Belize
433.	86	Substantive	<u>If a chemical treatment is required this, should not be specified in a more restrictive way than is technically justified, e.g. the type of treatment rather than a specific pesticide, and if necessary, the active ingredient or the formulation.</u>  <u>If a seed treatment is required, then a requirement that can be applied to seeds marketed for organic production should be considered.</u>  Appendix 2 of this standard provides an overview of available treatments for each pest category.	Two additional sentences to add elements of treatments that are important for international movement of seeds.	EPPO, Georgia, European Union, Serbia
434.	86	Substantive	Appendix <del>2</del> 4 of this standard provides an overview of available treatments for each pest category.	Because of changing annex I and II to appendix I and II, so the number of appendixs have to be changed.	Thailand
435.	86	Technical	<del>Appendix 2 of this standard provides an overview of available treatments for each pest category.</del>	We propose to delet Appendix 2 and include the content in Section 1.3.3 .	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
436.	<a href="#">87</a>	Substantive	<b>2.5 Packaging <u>and labelling</u></b>	Labelling is essential for traceability and should be linked to packaging.	EPPO, Georgia, European Union, Serbia, Algeria
437.	<a href="#">87</a>	Technical	<b><del>2.5 Packaging</del></b>	We propose to delete this section. Seed "Packaging" is included in Section 1.3.1 as a measure of seed production that could be considered.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
438.	<a href="#">88</a>	Editorial	Seeds should be packed in a way that prevents exposure to pests <del>and prevents tampering.</del>	tampering is not a PS issue.	Singapore, China, Korea, Republic of, Ghana, Belize
439.	<a href="#">88</a>	Editorial	Seeds should be packed in a way that prevents exposure to pests and prevents tampering. <u>It is recommended that seeds should not be traded in bulk.</u>	add "It is recommended that seeds should not be traded in bulk" We propose to add this sentence to give more information	Indonesia
440.	<a href="#">88</a>	Editorial	Seeds should be packed in a way that prevents exposure to pests <del>and prevents tampering.</del>	tampering is not a Phytosanitary issue.	Thailand
441.	<a href="#">88</a>	Substantive	Seeds <del>may</del> <u>should</u> be packed in a way that prevents exposure to pests and prevents tampering.	Replace "should" with "may" for clarity.	Canada
442.	<a href="#">88</a>	Substantive	Seeds should be packed in a way that prevents <del>contamination</del> <u>exposure</u> <del>to</del> <u>by</u> pests <del>and prevents tampering.</del>	• Deletion of the wording "exposure" and "prevents tampering" because tampering is not a phytosanitary measure and contamination is used in systems approach. In addition exposure is not an IPPC terminology.	South Africa
443.	<a href="#">88</a>	Substantive	Seeds should be packed in a way that prevents exposure to pests <del>and prevents tampering.</del>	Prevention of tampering is not a phytosanitary consideration.	Australia
444.	<a href="#">88</a>	Technical	Seeds should be packed in a way that prevents exposure to pests <del>and prevents tampering.</del>	The prevention of tampering is not a phytosanitary issue.	New Caledonia*
445.	<a href="#">88</a>	Technical	<u>The NPPO of the importing country may require that seeds should be packed and sealed in a way that prevents infestation by regulated exposure to pests and prevents tampering, and labelled to enable traceability.</u>	It should be clear that the importing country may require this and that labelling is an important element for traceability and linked to packaging.	EPPO, Georgia, European Union, Serbia, Algeria
446.	<a href="#">88</a>	Technical	<del>Seeds should be packed in a way that prevents exposure to pests and prevents tampering.</del>	See comment in Para 87.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
447.	89	Editorial	<b>2.6 <del>Measures for s</del>Seed production</b>	This is one of phytosanitary measures, so it's not necessary to use the word "Measures for"	Thailand
448.	89	Substantive	<p><b>2.6 Measures for seed production</b></p> <p><u>1. The Measures for seed production are not clear and create a lot of confusion from language and technical points of views, therefore paragraphs (89-115) should be revised to be in consistency with the phytosanitary measures and phytosanitary terms.</u></p> <p><u>2. "Measures of seed production "suggested here they are part of the practices in the seed certification scheme that should be recognized as phytosanitary measures by NPPOs.</u></p> <p><u>3. The word measures should be restricted for phytosanitary measure and be differentiated from other measures by using term practices/procedures in the draft ISPM.</u></p>	Consistency with phytosanitary measures and terms	NEPPO, Bahrain, Morocco
449.	89	Technical	<b>2.6 Measures <u>used in</u> <del>for</del> seed production</b>	Better reflecting the contents of this section.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
450.	89	Technical	<b><del>2.6 Measures for seed production</del></b>	Concept of this section, which is to consider seed production management practices in the PRA process, was moved to item 1.3.1 Seed Certification Schemes, because this certification schemes include all the measures described in Section 2.6 .	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
451.	90	Editorial	<del>Measures used for</del> <u>Pest risk management of</u> seed production could also be <u>phytosanitary measures</u> applied <del>for pest risk management of seed production.</del> <del>These</del> <u>The</u> measures should be implemented bearing in mind the specific crop-pest combination and they should cover all stages of seed production. The measures should ensure full traceability.	more concise	Thailand
452.	90	Substantive	Measures used for seed production could also be applied for pest risk management of seed production. These measures should be implemented bearing in mind the specific crop-pest combination and they should cover all stages of seed production. The measures should ensure <del>full</del> traceability.	Not sure what "full" means in this context	United States of America

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
453.	90	Substantive	Measures used for seed production <del>may</del> could also be applied for pest risk management of seed production. These measures <del>may</del> should be implemented bearing in mind the specific crop–pest combination and they <del>may</del> should cover all stages of seed production. The measures <del>may facilitate</del> should ensure full traceability.	1. Replace "could" and "should" with "can" and "may", respectively, as seed production measures are not necessarily required. 2. Replace "should ensure full" with "may facilitate". Ensure is too strong a word.	Canada
454.	90	Substantive	Measures used for seed production could also be applied for pest risk management of seed <del>produced</del> <u>in the country of origin and exported to another country</u> . These measures should be implemented bearing in mind the specific crop–pest combination and they should cover all stages of seed production. The measures should ensure full traceability.	Addition of "in the country of origin and exported to another country", the reason being that seeds can be produced in various countries therefore this measure can only apply when seeds are produced from one country.	South Africa
455.	90	Substantive	Measures used for seed production could also be applied for pest risk management of seed production. These measures should be implemented bearing in mind the specific crop–pest combination and they should cover all stages of seed production. <del>The measures should ensure full traceability.</del>	To include a specification of its kind in the ISPM should be developed first, mechanisms for verification.	OIRSA
456.	90	Technical	<u>Certain m</u> Measures used <del>in</del> for seed production <u>may alone, or in combination, be recognized as phytosanitary measures by the NPPO of the importing country or by the NPPO of the exporting country in order to fulfil the phytosanitary import requirements of the importing country, provided that full documentation of measures applied to the seed lot is maintained</u> <del>could also be applied for pest risk management of seed production. These measures should be implemented bearing in mind the specific crop–pest combination and they should cover all stages of seed production. The measures should ensure full traceability.</del>	More precise description of how industry practices may be used. Traceability is then an essential element.	EPPO, Georgia, Norway, Serbia, Algeria
457.	90	Technical	<del>Measures used for seed production could also be applied for pest risk management of seed production. These measures should be implemented bearing in mind the specific crop–pest combination and they should cover all stages of seed production. The measures should ensure full traceability.</del>	This Paragraph was deleted because its concept was included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
458.	90	Technical	<u>Certain m</u> Measures used <del>in</del> for seed production <u>may alone, or in combination, be recognized as phytosanitary measures by the NPPO of the importing country or by the NPPO of the exporting country in order to fulfil the phytosanitary import requirements of the importing country, provided that full documentation of measures applied to the seed lot is maintained</u> <del>could also be applied for pest risk management of seed production. These measures should be implemented bearing in mind the specific crop–pest combination and they should cover all stages of seed production. The measures should ensure full traceability.</del>	More precise description of how industry practices may be used. Traceability is then an essential element.	European Union
459.	90	Technical	Measures used for seed production could also be applied for pest risk management of seed production. These measures should be implemented bearing in mind the specific crop–pest combination and they should cover all stages of seed production. The measures should ensure <del>full</del>	for more clarity	Korea, Republic of, Ghana, Belize

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>traceability</del> <u>trace back</u> .		
460.	<u>90</u>	Technical	Measures used for seed production could also be applied for pest risk management of seed production. These measures should be implemented bearing in mind the specific crop–pest combination and they should cover all stages of seed production. The measures should ensure <u>trace back</u> <del>full traceability</del> .	Relevant trace back required in a quarantine sense rather than necessarily full traceability of the seed.	Australia
461.	<u>91</u>	Editorial	<del>A phytosanitary measure</del> <u>Pest risk management of seed production</u> approved by the NPPO of the exporting country after consultation with the importing country may be included in <del>pest risk management and hygiene</del> <u>the</u> protocols based on <del>best</del> <u>Good Agricultural p</u> Practices (GAP). The NPPO of the exporting country should monitor the correct use and implementation of such approved protocols.	more clarity	Thailand
462.	<u>91</u>	Substantive	A phytosanitary measure <del>approved by the NPPO of the exporting country after consultation with the importing country</del> may be included in pest risk management and <u>quality</u> <del>hygiene</del> protocols based on best practices. The NPPO of the exporting country should monitor the correct use and implementation of such approved protocols.	1. Delete the phrase "approved by the NPPO...". Phytosanitary measures are typically approved by the NPPO of the importing country, not the exporting country. That said, the NPPO of the importing country would only need to approve the measure if specified in their phytosanitary import requirements. Often the importing country specifies only that the commodity must be free from quarantine pests, not how. 2. Delete "hygiene" and add "quality" as it is more appropriate. The term "hygiene" brings to mind human health concerns.	Canada
463.	<u>91</u>	Substantive	A phytosanitary measure approved by the NPPO of the exporting country after consultation with the importing country may be included in <u>integrated</u> pest risk management <del>and hygiene</del> protocols <del>based on best practices</del> . The NPPO of the exporting country should monitor the correct use and implementation of such approved protocols.	Deletion of "and hygiene" the reason being that the integrated pest risk management includes hygiene as one of the best practices. Deletion of "based on best practices" for better reading.	South Africa
464.	<u>91</u>	Technical	A phytosanitary measure <u>required</u> <del>approved</del> by the NPPO of the exporting <u>or importing</u> country <del>after consultation with the importing country</del> may be included in pest risk management and hygiene protocols <u>applied in seed production</u> <del>based on best practices</del> . The NPPO of the exporting country should monitor the correct use and implementation of such approved protocols.	Clearer wording also complementary to paragraph 90.	EPPO, Georgia, European Union, Norway, Serbia
465.	<u>91</u>	Technical	<del>A phytosanitary measure approved by the NPPO of the exporting country after consultation with the importing country may be included in pest risk management and hygiene protocols based on best practices. The NPPO of the exporting country should monitor the correct use and implementation of such approved protocols.</del>	Confusing paragraph, the NPPO of the exporting country does not approve phytosanitary measures after consultation with the importing country. It is the importing country when conducting the PRA who has to consider seed production practices in pest risk management stage to identify if some of these measures can be considered appropriate	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				phytosanitary measures.	
466.	92	Editorial	Measures that may be recognized, <del>and for which the NPPO may develop specific requirements, may include:</del>	Already covered in paragraph 90 and 91.	EPPO, Georgia, European Union, Serbia
467.	92	Substantive	Measures that may be recognized, and for which the NPPO may develop specific <u>phytosanitary import</u> requirements, may include:	Add "phytosanitary import" to the sentence for clarity. Delete comma as it is not required.	Canada
468.	92	Technical	<del>Measures that may be recognized, and for which the NPPO may develop specific requirements, may include:</del>	Deleted because Measures below this paragraph were included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
469.	93	Technical	<del>Pre-planting:</del>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
470.	94	Substantive	<ul style="list-style-type: none"> <li>use of tested, healthy planting material (<u>free of any pests</u>)</li> </ul>	For clarification	United States of America
471.	94	Substantive	<ul style="list-style-type: none"> <li>use of tested, healthy <u>seed</u> <del>planting material</del></li> </ul>	Replacement of "planting material" with "seed" the reason being that only seed is included in the scope of this standard.	South Africa
472.	94	Technical	<ul style="list-style-type: none"> <li>use of tested, healthy planting material</li> <li><u>pesticide treatment of seeds</u></li> </ul>	Add an additional element.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
473.	94	Technical	<ul style="list-style-type: none"> <li><del>use of tested, healthy planting material</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
474.	95	Technical	<ul style="list-style-type: none"> <li><del>crop rotation</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
475.	96	Editorial	<ul style="list-style-type: none"> <li>field selection</li> </ul>	to split the existing sentence to two bullet points instead.	Singapore, China, Korea, Republic of,



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<ul style="list-style-type: none"> <li>use of resistant or less susceptible varieties</li> </ul>		Ghana
476.	96	Editorial	<ul style="list-style-type: none"> <li>field selection</li> <li>use of resistant or less susceptible varieties</li> </ul>	These are two separate elements	EPPO, Georgia, European Union, Norway, Serbia, Algeria
477.	96	Editorial	<ul style="list-style-type: none"> <li>field selection</li> <li>use of resistant or less susceptible varieties</li> </ul>	'Use of resistant or less susceptible varieties' should be another bullet	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
478.	96	Editorial	<ul style="list-style-type: none"> <li>field selection</li> <li>use of resistant or less susceptible varieties</li> </ul>	This bullet should be divided into 2 points.	Thailand
479.	96	Editorial	<ul style="list-style-type: none"> <li>field selection <del>use of resistant or less susceptible varieties</del></li> </ul>	Clarification of text	ISF*
480.	96	Editorial	<ul style="list-style-type: none"> <li>field selection use of resistant or less susceptible varieties</li> </ul>	I am not anymore sure of the meaning of this sentence, does it mean use of resistant or less susceptible varieties ? Does field selection mean pest free field choice?	ISTA*
481.	96	Editorial	<ul style="list-style-type: none"> <li>field selection <del>use of resistant or less susceptible varieties</del></li> <li><u>use of resistant or less susceptible varieties-</u></li> </ul>	Editorial correction	Japan
482.	96	Editorial	<ul style="list-style-type: none"> <li>field selection</li> <li>use of resistant or less susceptible varieties</li> </ul>	Separation of sentence into two bullets, because these are two different measures applied during pre-planting.	South Africa
483.	96	Substantive	<ul style="list-style-type: none"> <li>field selection</li> <li>use of <u>tolerant</u><del>resistant</del> or less susceptible varieties</li> </ul>	1. Separate into two bullets. 2. Global change from "resistant" to "tolerant" as per comment in para. 77.	Canada



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
484.	96	Technical	<ul style="list-style-type: none"> <li>field selection <u>for minimal risk of infestation</u> use of resistant or less susceptible varieties</li> </ul>	Clarification of field selection.	EPPO, Georgia, Norway, Serbia, Algeria
485.	96	Technical	<ul style="list-style-type: none"> <li>field selection use of resistant or less susceptible varieties</li> <li><u>use of resistant varieties or rootstocks</u></li> </ul>	The use of varieties and rootstocks resistant to diseases affecting the crop in question is common in the seed industry.	ISF*
486.	96	Technical	<ul style="list-style-type: none"> <li><del>field selection use of resistant or less susceptible varieties</del></li> </ul>	Concept included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
487.	96	Technical	<ul style="list-style-type: none"> <li>field selection <u>for minimal risk of infestation</u> use of resistant or less susceptible varieties</li> <li><u>use of resistant root stocks, especially for soil borne pests</u></li> </ul>	Clarification of field selection. Add another relevant element.	European Union
488.	96	Technical	<ul style="list-style-type: none"> <li>field selection use of <del>tolerant</del>resistant or less susceptible varieties</li> </ul>	tolerance rather than resistance	Australia
489.	97	Technical	<ul style="list-style-type: none"> <li>soil treatment</li> <li><u>geographical or temporal isolation from potential pest sources</u></li> <li><u>sanitation or disinfection of water used in protected production areas</u></li> </ul>	1. (first new bullet point added) Geographical or temporal isolation is a common practice in the seed industry 2. (second new bullet point added) Water can be a risk for some seed transmitted pathogens during seed production.	ISF*
490.	97	Technical	<ul style="list-style-type: none"> <li><del>soil treatment</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
491.	98	Technical	<del>Pre-harvest:</del>	Include in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
492.	99	Editorial	<ul style="list-style-type: none"> <li><del>hygiene measures (e.g. disinfection of workers' hands or shoes)</del></li> </ul>	Deleted because is not relevant for pest risk management.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
493.	<a href="#">99</a>	Substantive	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes, <a href="#">and equipment</a>)</li> </ul>	Equipment should be disinfected.	Japan
494.	<a href="#">99</a>	Substantive	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes <a href="#">and equipments</a>)</li> </ul>	Addition of "and equipment" the reason being that it is part of examples of hygiene measures applied during pre-harvest (contextual clarification).	South Africa
495.	<a href="#">99</a>	Technical	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes <a href="#">or equipment</a>)</li> </ul>	To include equipment that should be disinfested.	Singapore, China, Korea, Republic of, Ghana, Belize
496.	<a href="#">99</a>	Technical	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes <a href="#">and machinery or vehicles</a>)</li> </ul>	Clarification by giving additional examples.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
497.	<a href="#">99</a>	Technical	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes, <a href="#">farm equipment and tools</a>)</li> </ul>	Farm equipment and tools can also be a carrier of disease.	ISF*
498.	<a href="#">100</a>	Technical	<ul style="list-style-type: none"> <li>field inspection <a href="#">and, where appropriate, testing if symptoms are observed</a></li> </ul>	In contrast to systematic testing, tetsing may also be used only when symptoms are observed.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
499.	<a href="#">100</a>	Technical	<ul style="list-style-type: none"> <li><del>field inspection</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
500.	<a href="#">101</a>	Editorial	<ul style="list-style-type: none"> <li>sanitation (e.g. rogueing of infected or suspicious plants, weeds, plant debris)</li> </ul>	the correct word is "roguing"	New Caledonia*
501.	<a href="#">101</a>	Editorial	<ul style="list-style-type: none"> <li><a href="#">field</a> sanitation (e.g. rogueing of infected or suspicious plants, weeds, plant debris)</li> </ul>	Inclusion for better clarity.	Singapore, China, Korea, Republic of, Ghana, Belize

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
502.	101	Editorial	<ul style="list-style-type: none"> <li>field sanitation (e.g. rogueing of infected or suspicious plants, weeds, plant debris)</li> </ul>	The word "field" should be added for better understanding.	Thailand
503.	101	Editorial	<ul style="list-style-type: none"> <li>sanitation (e.g. <del>rogueing</del> <u>roguing</u> of infected or suspicious plants, weeds, plant debris)</li> </ul>	Correction on the spelling of a technical term.	ISF*
504.	101	Substantive	<ul style="list-style-type: none"> <li>sanitation (e.g. rogueing of infected or suspicious plants, weeds, plant debris)</li> </ul>	the word "roguing" should be clarified	New Caledonia*
505.	101	Substantive	<ul style="list-style-type: none"> <li>sanitation (e.g. rogueing of infected or <u>symptomatic</u><del>suspicious</del> plants, weeds, plant debris, <u>appropriate crop isolation distances from sources of infestation</u>)</li> </ul>	1. Delete "suspicious" and add "symptomatic" for clarity and it is more appropriate. 2. Add crop isolation as another relevant factor.	Canada
506.	101	Substantive	<ul style="list-style-type: none"> <li>sanitation (e.g. <u>roguing</u><del>rogueing</del> of infected or suspicious plants, weeds, <del>plant debris</del>)</li> </ul>	Editorial on spelling of technical term (rogueing). Deletion of "plant debris" because removal of plant debris is part of harvest and post-harvest handling.	South Africa
507.	101	Technical	<ul style="list-style-type: none"> <li>sanitation (e.g. rogueing of infected or suspicious plants, weeds, <del>plant debris</del>)</li> </ul>	Removal of plant debris is part of harvest and post-harvest handling (see [112]).	ISF*
508.	101	Technical	<ul style="list-style-type: none"> <li><del>sanitation (e.g. rogueing of infected or suspicious plants, weeds, plant debris)</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
509.	101	Technical	<ul style="list-style-type: none"> <li>sanitation (e.g. <u>removal</u><del>rogueing</del> of <u>symptomatic</u><del>infected or suspicious</del> plants, weeds, plant debris)</li> </ul>	Roguing is not a universally known term and more appropriate to refer to symptomatic plants rather than 'infected or suspicious plants'.	Australia
510.	102	Technical	<ul style="list-style-type: none"> <li><del>parent plant testing</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
511.	103	Technical	<ul style="list-style-type: none"> <li><del>crop treatment</del></li> </ul>	Included in Para 76,	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
512.	104	Editorial	<ul style="list-style-type: none"> <li>protected <del>environment</del> <del>conditions</del></li> </ul>	For consistent usage of terms.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
513.	104	Editorial	<ul style="list-style-type: none"> <li>protected <del>conditions</del> <u>environments (e.g. glasshouses, growth chambers)</u></li> </ul>	Consistency with language used in [68].	ISF*
514.	104	Editorial	<ul style="list-style-type: none"> <li>protected <del>conditions</del> <u>environments (e.g. glasshouses, growth chambers)</u></li> </ul>	Editorial correction. To make wording consistent with [65] and [68] .	Japan
515.	104	Editorial	<ul style="list-style-type: none"> <li><u>quarantine</u> <del>protected</del> conditions</li> </ul>	These are quarantine conditions. Consistent wording.	Australia
516.	104	Substantive	<ul style="list-style-type: none"> <li>protected <u>environments</u> <del>conditions</del></li> </ul>	• Replacement of “conditions” with “environment” to be consistent with the wording used in paragraph 68.	South Africa
517.	104	Technical	<ul style="list-style-type: none"> <li>protected conditions</li> </ul>	The phrase required clarification	New Caledonia*
518.	104	Technical	<ul style="list-style-type: none"> <li>protected <u>cultivation</u> <del>conditions</del></li> </ul>	For clarification	EPPO, Georgia, Norway, Serbia, Algeria
519.	104	Technical	<ul style="list-style-type: none"> <li>protected conditions</li> <li><u>sanitation or disinfection of water used in protected production areas</u></li> </ul>	(bullet point added) Water can be a risk during seed production for some seed transmitted pathogens.	ISF*
520.	104	Technical	<ul style="list-style-type: none"> <li><del>protected conditions</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
521.	104	Technical	<ul style="list-style-type: none"> <li>protected <u>cultivation</u> <del>conditions</del> <u>(e.g. glasshouses, growth chambers)</u></li> </ul>	For clarification	European Union
522.	105	Technical	<del>Harvest and post-harvest handling:</del>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Peru, Argentina
523.	106	Substantive	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes)</li> </ul>	Also of harvest supplies and machines	ISTA*
524.	106	Substantive	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes, <u>and equipment</u>)</li> </ul>	Same as [99]	Japan
525.	106	Substantive	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes <u>and equipments</u>)</li> </ul>	Addition of "and equipment" for contextual clarification because it is part of examples of hygiene measures applied during pre- harvest.	South Africa
526.	106	Technical	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes <u>or equipment</u>)</li> </ul>	Same as para 99 - inclusion of equipment for disinfection.	Singapore, China, Korea, Republic of, Ghana, Belize
527.	106	Technical	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes, <u>harvesting and post-harvesting machinery/equipment, and storage facilities</u>)</li> </ul>	Clarification by giving more examples.	EPPO, Georgia, European Union, Serbia, Algeria
528.	106	Technical	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes, <u>farm equipment and tools</u>)</li> </ul>	Farm equipment and tools can be a carrier of disease.	ISF*
529.	106	Technical	<ul style="list-style-type: none"> <li><del>hygiene measures (e.g. disinfection of workers' hands or shoes)</del></li> </ul>	Deleted because it is not relevant for pest risk management.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
530.	106	Technical	<ul style="list-style-type: none"> <li>hygiene measures (e.g. disinfection of workers' hands or shoes, <u>harvesting and post-harvesting machinery/equipment and storage facilities</u>)</li> </ul>	Additional relevant examples	Norway
531.	107	Technical	<ul style="list-style-type: none"> <li><del>use of disinfectants during seed extraction</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
532.	107	Technical	<ul style="list-style-type: none"> <li>use of disinfectants <u>(on material and equipment, plant material)</u> during</li> </ul>	For clarify	OIRSA

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			seed extraction		
533.	108	Substantive	<ul style="list-style-type: none"> <li>• <a href="#">seed drying</a></li> <li>• seed cleaning</li> </ul>	To include this addition process under seed processing.	Singapore, China, Korea, Republic of, Ghana, Belize
534.	108	Substantive	<ul style="list-style-type: none"> <li>• seed cleaning <a href="#">and sorting</a></li> <li>• <a href="#">seed viability test</a></li> </ul>	We propose to add "and sorting" Although it is not quarantine concern, "seed viability test" may be needed to evaluate seeds performance	Indonesia
535.	108	Substantive	<ul style="list-style-type: none"> <li>• <a href="#">seed drying</a><del>seed</del> <a href="#">and</a> cleaning</li> </ul>	add drying process	Thailand
536.	108	Substantive	<ul style="list-style-type: none"> <li>• <a href="#">seed drying</a></li> <li>• seed cleaning</li> </ul>	To include this additional process under seed processing.	Japan
537.	108	Substantive	<ul style="list-style-type: none"> <li>• seed cleaning, <a href="#">condition and sorting</a></li> </ul>	Addition of "conditioning and sorting" the reason being that seed conditioning and sorting of infected or suspicious seeds and seed of noxious weeds are important risk mitigation measures routinely used by the seed industry during harvest and post-harvest.	South Africa
538.	108	Technical	<ul style="list-style-type: none"> <li>• seed cleaning</li> <li>• <a href="#">seed sampling for testing to detect pests</a></li> </ul>	Additional relevant option	EPPO, Georgia, Norway, Serbia, Algeria
539.	108	Technical	<ul style="list-style-type: none"> <li>• seed cleaning, <a href="#">conditioning and sorting</a></li> </ul>	Seed conditioning and sorting of infected or "suspicious" seeds and seeds of noxious weeds are important risk mitigation measures routinely used by the seed industry during harvest and post-harvest.	ISF*
540.	108	Technical	<ul style="list-style-type: none"> <li>• <del>seed cleaning</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
541.	108	Technical	<ul style="list-style-type: none"> <li>• seed <a href="#">sorting and</a> cleaning</li> </ul>	Add sorting to cleaning because it has a slightly different meaning and therefore both should be mentioned. Additional relevant option	European Union

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<ul style="list-style-type: none"> <li>seed sampling for testing to detect pests</li> </ul>		
542.	109	Technical	<ul style="list-style-type: none"> <li><del>seed storage</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
543.	110	Editorial	<ul style="list-style-type: none"> <li>seed treatment (See 2.4)</li> </ul>	For better linkages & referencing.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
544.	110	Technical	<ul style="list-style-type: none"> <li><del>seed treatment</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
545.	111	Editorial	<ul style="list-style-type: none"> <li>seed packaging (See 2.5)</li> </ul>	For better linkage and referencing.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
546.	111	Technical	<ul style="list-style-type: none"> <li>Exchange the order of Para.111 and Para.112.seed packaging</li> </ul>	It's logically more reasonable.	China
547.	111	Technical	<ul style="list-style-type: none"> <li>sanitation (e.g. removing plant debris or soil or rogueing of infected plants)</li> <li>seed packaging, sealing and labelling</li> </ul>	Additional important elements of the production system that could be of use for phytosanitary purposes. Sanitation is moved from paragraph 112 to put it before packaging because in practice it is also applied before packaging.	EPPO, Georgia, European Union, Serbia, Algeria
548.	111	Technical	<ul style="list-style-type: none"> <li><del>seed packaging</del></li> </ul>	Included in Para 76.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
549.	112	Substantive	<ul style="list-style-type: none"> <li>sanitation (e.g. removing plant debris and <del>soil or rogueing of infected plants</del>)</li> </ul>	Replacement of "rogueing of infected plants" with "and soil" because rogueing of infected plants is done during pre planting and removal of soil is part of sanitation during post harvest.	South Africa



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
550.	112	Technical	<ul style="list-style-type: none"> <li>sanitation (e.g. removing plant debris or roguing of infected plants)</li> </ul>	Move to paragraph 111 to have a more logical order of measures, in the same order as they are applied in the seed production practices.	EPPO, Georgia, European Union, Serbia, Algeria
551.	112	Technical	<ul style="list-style-type: none"> <li>sanitation (e.g. removing plant debris, <u>soil</u> or roguing of infected plants)</li> </ul>	1. Removal of soil from is an important sanitation measure. 2. Roguing of infected plants is done at an earlier stage, see [101].	ISF*
552.	112	Technical	<ul style="list-style-type: none"> <li>sanitation (e.g. removing plant debris or roguing of infected plants)</li> </ul>	Deleted because it is included in pre-harvest measures.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
553.	112	Technical	<ul style="list-style-type: none"> <li>sanitation (e.g. removing plant debris or roguing of <u>visibly infested</u> infected plants <u>seed</u>)</li> </ul>	Roguing is not a universally known term and removal is more appropriate. It would be removal of visibly infested seed only. Add visibly to clarify this. Infested, swapped for infested as this term under ISPM 5 covers both arthropod and pathogen pests. Swap plant for seed as we are talking about post harvest measures, so it would be seed that is rogued out.	Australia
554.	113	Technical	- <del>Transportation and distribution:</del>	Deleted because it is not relevant for pest risk management.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
555.	114	Editorial	<ul style="list-style-type: none"> <li><del>Packaging (e.g. pest proof packaging material)</del></li> </ul>	Already present in paragraph 111, repetition not needed. There it is in the right place to maintain a logical order in line with the sequence of processes in the seed processing chain.	EPPO, Georgia, European Union, Serbia, Algeria
556.	114	Editorial	<ul style="list-style-type: none"> <li><del>P</del>ackaging (e.g. pest proof packaging material)</li> </ul>	Consistency with other bullet points.	ISF*
557.	114	Technical	<ul style="list-style-type: none"> <li><del>Packaging (e.g. pest proof packaging material)</del></li> </ul>	Deleted because it is not relevant for pest risk management.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
558.	115	Editorial	<ul style="list-style-type: none"> <li>maintaining phytosanitary security of <del>the</del> consignments<u>s</u>.</li> </ul>	Better wording	EPPO, Georgia, European Union,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Serbia, Algeria
559.	115	Substantive	<ul style="list-style-type: none"> <li>maintien de la sécurité phytosanitaire de l'envoi <u>par le contenant les documents de certification à l'origine et l'historique de la production.</u></li> </ul>	Permet dans la traçabilité de disposer à tous les stades du trafic les informations de base sur la production de la semence	Burundi
560.	115	Substantive	<ul style="list-style-type: none"> <li>maintien de la sécurité phytosanitaire de l'envoi</li> <li><u>connaissance de la traçabilité des semences</u></li> </ul>	Ajouter un paragraphe sur la traçabilité des semences qui est un paramètre important	Gabon
561.	115	Substantive	<ul style="list-style-type: none"> <li><del>maintaining phytosanitary security of the consignment.</del></li> </ul>	Deletion of the sentence, the reason being that it's not part of the production process.	South Africa
562.	115	Technical	<ul style="list-style-type: none"> <li>maintaining <u>the integrity and prevent the infestation and the contamination on phytosanitary security</u> of the consignment.</li> </ul>	The phytosanitary security is not a measure in itself and is a defined term.	New Caledonia*
563.	115	Technical	<ul style="list-style-type: none"> <li><del>maintaining phytosanitary security of the consignment.</del></li> </ul>	Deleted because it is not relevant for pest risk management.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
564.	115	Technical	<ul style="list-style-type: none"> <li>maintaining <u>integrity and prevent infestation and contamination</u> <del>phytosanitary security</del> of the consignment.</li> </ul>	Needs more clarification than phytosanitary security of the consignment.	Australia
565.	116	Technical	<b>2.7.5 Post-entry quarantine</b>	See comment in Para 81.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
566.	117	Substantive	<p>NPPOs may apply post-entry quarantine to seeds considered to pose a high risk of introducing quarantine pests. Guidance on post-entry quarantine stations is provided in ISPM 34:2010.</p> <p><u>As part of post-entry quarantine a sample of the seed lot may be sown and the progeny plants tested.</u></p>	To add an additional element of post-entry quarantine, especially for seeds.	EPPO, Georgia, European Union, Serbia
567.	117	Substantive	<p><u>The</u> NPPOs may apply post-entry quarantine to seeds <del>considered to pose a high risk of introducing quarantine pests</del> <u>in cases where a regulated pest is difficult to detect, where it takes time for a sign or symptom expression, or where testing or treatment is required.</u> Guidance on post-entry quarantine stations is provided in ISPM 34:2010.</p>	Deletion of “considered to pose a high risk of introducing quarantine pests” and replace with “in cases where a regulated pest is difficult to detect, where it takes time for a sign or symptom expression, or where testing or treatment is	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				required", reason being that PEQ is not related to the high risk of the consignment but is related to specific pest as used in ISPM 34.	
568.	117	Technical	NPPOs may apply post-entry quarantine to seeds considered to pose a high risk of introducing quarantine pests <u>(including plants as pests)</u> . Guidance on post-entry quarantine stations is provided in ISPM 34:2010.	To emphasise that plants of pests are also covered.	EPPO, Georgia, Serbia, Algeria
569.	117	Technical	<del>NPPOs may apply p</del> Post-entry quarantine <u>may be established</u> to seeds considered to pose a high risk of introducing quarantine pests, <u>including confinement in a quarantine station</u> . Guidance on post-entry quarantine stations is provided in ISPM 34:2010.	Measures are established by NPPO. Text added to clarify that post entry quarantine may include confinement in a quarantine station.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
570.	117	Technical	NPPOs may apply post-entry quarantine to seeds considered to pose a high risk of introducing quarantine pests <u>(including plants as pests)</u> . Guidance on post-entry quarantine stations is provided in ISPM 34:2010.	To emphasise that plants as pests are also covered.	European Union
571.	118	Substantive	The NPPO of the importing country may consider, based on the findings of a PRA, that the risk of a regulated pest introduction can be <u>adequately</u> <del>sufficiently</del> managed by requiring the imported seeds to be planted in a designated planting area. The planting area should provide isolation from other host plants, and weed control and hygiene measures for people, machinery and tools should be used as needed.	Delete "sufficiently" and add "adequately" for clarity.	Canada
572.	118	Substantive	The NPPO of the importing country may consider, based on the findings of a PRA, that the risk of a regulated pest introduction can be sufficiently managed by requiring the imported seeds to be planted in a designated planting area. The planting area should provide isolation from other host plants, and weed control and hygiene measures for people, machinery and <u>equipment</u> <del>tools</del> should be used as needed.	• Deletion of "tools" and addition of "equipment" for consistency with paragraph 106.	South Africa
573.	118	Technical	The NPPO of the importing country may consider, based on the findings of a PRA, that the <u>pest</u> risk of a regulated pest introduction can be sufficiently managed by requiring the imported seeds to be planted in a designated planting area. The planting area should provide isolation from other host plants, and weed control and hygiene measures for people, machinery and tools <u>may be required</u> <del>should be used as needed</del> . <u>Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the designated planting area.</u>	Combining paragraph 119 with 118, for clarity.	EPPO, Georgia, Serbia
574.	118	Technical	The NPPO of the importing country may consider, based on the findings of a PRA, that the risk of a regulated pest introduction can be sufficiently managed by requiring the imported seeds to be planted in a designated planting area. The planting area should provide isolation from other host plants, and weed control and <u>sanitation and disinfection procedures</u> <del>hygiene measures</del> for people, machinery and tools should be used as needed.	To be in consistency with the IPSM 34	NEPPO, Bahrain, Morocco, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
575.	118	Technical	The NPPO of the importing country may consider, based on the findings of a PRA, that the risk of <del>introduction of a regulated quarantine pest introduction</del> can be <del>sufficiently</del> managed by requiring the imported seeds to be planted in a designated planting area. The planting area should provide isolation from other host plants, and weed control and hygiene measures for people, machinery and tools should be used as needed.	Post-entry quarantine is a phytosanitary measure that should be applied only for quarantine pests and not for RNQP.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
576.	118	Technical	The NPPO of the importing country may consider, based on the findings of a PRA, that the <del>pest risk of a regulated pest introduction</del> can be sufficiently managed by requiring the imported seeds to be planted in a designated planting area. The planting area should provide isolation from other host plants, and weed control and hygiene measures for people, machinery and tools <del>may be required. should be used as needed. Isolation may not be appropriate for symptomless pests or pests with insect vectors capable of spreading from the designated planting area.</del>	Combining paragraph 119 with 118, for clarity.	European Union
577.	118	Technical	The NPPO of the importing country may consider, based on the findings of a PRA, that the <del>pest risk of a regulated pest introduction</del> can be sufficiently managed by requiring the imported seeds to be planted in a designated planting area. The planting area should provide isolation from other host plants, and weed control and hygiene measures for people, machinery and tools <del>may be required. should be used as needed. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the designated planting area.</del>	Simplify and not to include RNQP Combining paragraph 119 with 118, for clarity.	Norway
578.	119	Substantive	Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic viruses <del>or viroids</del> that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.	To include another pest type that are involved.	Singapore, China, Korea, Republic of, Ghana, Belize
579.	119	Substantive	<del>Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence.</del> Regulated pests for which isolation may be appropriate include symptomatic viruses that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.	These issues to be considered in the PRA	NEPPO, Bahrain, Morocco, Algeria
580.	119	Substantive	Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic viruses <del>or viroids</del> that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.	The term "viroids" should be added to specify pests other than viruses that are not know to be vectored by insects.	Thailand

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
581.	119	Substantive	Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic viruses <u>and viroids</u> that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.	Viroids should be included.	Japan
582.	119	Substantive	Isolation may be considered, for example, for importation of a large amount of <del>high-risk</del> seeds (requiring post-entry quarantine) from an area <del>of low</del> with limited pest <del>prevalence, incidence. For example,</del> Regulated pests for which isolation may be appropriate, <del>may</del> include symptomatic <del>seed caused by</del> viruses that are not known to be vectored by insects, <u>mites, nematodes and others</u> . Isolation may not be appropriate for symptomless <del>seed caused by</del> pathogens or pathogens <del>that are known to be vectored by insects, mites, nematodes and others</del> with <del>insect-vectors</del> capable of spreading from the isolation area.	Deletion of “with limited and incidence” and the addition of “low pest prevalence”, in order to use the correct phytosanitary term according to ISPM 5 and grammatical editorial to align it with sentence number 2. ddition of “mites and nematodes” due to fact that not only insect vectors are capable of spreading from the isolation area. Deletion of “high risks” due to fact that PRA determines the level of risk associated with seed.	South Africa
583.	119	Technical	<del>Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic viruses that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.</del>	For clarity combined with paragraph 118.	EPPO, Georgia, European Union, Serbia
584.	119	Technical	Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic viruses <u>and viroids</u> that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.	Viroids are also regulated.	ISF*
585.	119	Technical	<del>Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic viruses that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.</del>	Text in this paragraph is confusing and contradictory. It mentions that the seed comes from an area of limited pest incidence, which is not clear to what refers, and at the same time it mentions that they pose high risk. Second sentence deleted because it is also confusing and this evaluation will be done during PRA.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
586.	119	Technical	Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic <del>pathogens</del> viruses that are not known to be vectored <del>by insects</del> . Isolation may not be appropriate for symptomless pathogens or <u>vectored</u> pathogens <del>with insect vectors</del> capable of spreading from the isolation	For clarify	OIRSA

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			area.		
587.	119	Technical	Isolation may be considered, for example, for importation of a large amount of high risk seeds (requiring post-entry quarantine) from an area with limited pest incidence. Regulated pests for which isolation may be appropriate include symptomatic viruses, <u>viroids and phytoplasmas</u> that are not known to be vectored by insects. Isolation may not be appropriate for symptomless pathogens or pathogens with insect vectors capable of spreading from the isolation area.	Inclusion for other pathogens that isolation may be appropriate for.	Australia
588.	120	Technical	<b>2.86 Prohibition</b>	See comment in Para 81.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
589.	121	Editorial	NPPOs may prohibit importation of seeds of certain species or origins considered <u>of high pest risk</u> if <del>they have</del> no suitable phytosanitary measures <u>are available, cf. Further guidance on prohibition can be found in</u> ISPM 20:2004. The decision to prohibit import should be based on a PRA.	Better wording	EPPO, Georgia, European Union, Serbia
590.	121	Substantive	NPPOs may prohibit importation of seeds of certain species or origins considered high risk if they have no <u>appropriate suitable</u> phytosanitary measures. Further guidance on prohibition can be found in ISPM 20:2004. The decision to prohibit import should be based on a PRA.	Consistency with ISPMs terms	NEPPO, Bahrain, Morocco, Algeria
591.	121	Substantive	NPPOs may prohibit importation of seeds of certain species or origins considered high risk if <del>they have</del> no <u>other</u> suitable phytosanitary measures <u>are available</u> . Further guidance on prohibition can be found in ISPM 20:2004. The decision to prohibit import should be based on a PRA.	In the first sentence, delete "they have" and add "other" and "are available", as this adds clarity.	Canada
592.	121	Substantive	NPPOs may prohibit importation of seeds of certain species or origins considered high risk if they have no suitable phytosanitary measures <u>or when a PRA determines that the seeds pose a high risk of becoming plants as a pest</u> . Further guidance on prohibition can be found in ISPM 20:2004. The decision to prohibit import should be based on a PRA <u>and must be scientifically justified</u> .	The proposed additional information provides greater clarity and focus and emphasized the fundamental principles of pest risk analysis	South Africa
593.	121	Technical	NPPOs may prohibit importation of seeds of certain species or origins considered high risk if they have no suitable phytosanitary measures. Further guidance on prohibition can be found in ISPM 20:2004. <u>This includes the situation where the seeds pose a high risk of becoming plants as pests. The decision to prohibit import should be based on a PRA.</u>	Deletion of the sentence on PRA because this is a repetition and therefore not needed here. Additional sentence to emphasize the possibility of seeds becoming a plant that is a pest.	EPPO, Georgia, European Union, Serbia
594.	122	Substantive	<del>Guidance on prohibition as an emergency measure is given in ISPM 13:2001.</del>	This reference is not relevant in this context	EPPO, Georgia, European Union, Norway, Serbia,



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Algeria
595.	122	Substantive	Guidance on prohibition as an <del>phytosanitary emergency</del> measure is given in ISPM <del>2013:20041</del> .	For the corresponding ISPM citation	OIRSA
596.	122	Substantive	<del>Guidance on prohibition as an emergency measure is given in ISPM 13:2001.</del>	This guidance is not provided in ISPM 13.	Australia
597.	122	Technical	<del>Guidance on prohibition as an emergency measure is given in ISPM 13:2001.</del>	ISPM 13:2001 does not provide guidance on prohibition.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
598.	123	Editorial	Importers may request the NPPO of the importing country to <del>allow imports</del> <del>permit seeds</del> for research or specialized commercial purposes <del>of otherwise prohibited seeds</del> . The NPPO may allow the entry of such seeds under a <del>specific import authorization, indicating</del> <del>permit, which should include</del> specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.	More comprehensive wording for clarity.	EPPO, Georgia, European Union, Serbia
599.	123	Substantive	<del>Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under a permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.</del>	No need, prohibition should be based only on PRA results and not generalization	NEPPO, Bahrain, Morocco
600.	123	Substantive	<del>Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes.</del> The NPPO may allow the entry of such seeds <del>that are normally prohibited</del> under a <del>specific import authorization</del> <del>permit</del> , which should include specific conditions to prevent the introduction and spread of regulated pests. <del>When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.</del>	1. Delete first sentence because ISPMs are guidelines for NPPOs not for regulated parties. 2. Add "that are normally prohibited" for clarity. Delete "permit" and add "specific import authorization" for consistency with section 4.2.2 of ISPM 20: Guidelines for a phytosanitary import regulatory system 3. Delete last sentence of the paragraph because prohibition, based on the conclusions of a PRA, is always an available phytosanitary measure and is not specific to seeds.	Canada
601.	123	Substantive	Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under a permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be	not sure what is the meaning of: "of becoming plants as pests" ?	ISTA*



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			considered as a phytosanitary measure.		
602.	123	Substantive	Importers may request the NPPO of the importing country to permit <del>prohibited</del> seeds for research or specialized commercial purposes <del>(refer to 1.2). The NPPO may allow the entry of such seeds under a permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.</del>	Addition of prohibited for contextual clarification. Deletion of the second and third sentences, reason being end use is already used to determine the risk.	South Africa
603.	123	Substantive	<del>Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under a permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.</del>	This is not relevant under prohibition.	Australia
604.	123	Technical	<del>Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under a permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.</del>	The exceptions in this paragraph are not clear to justify the introduction of prohibited species.	New Caledonia*
605.	123	Technical	Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under a permit, which should include specific conditions to prevent the introduction and spread of regulated pests. <del>When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.</del>	This sentence is moved to paragraph 121	EPPO, Georgia, European Union, Serbia
606.	123	Technical	Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under an <del>import</del> permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.	The Glossary defines 'import permit' and not 'permit'	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
607.	123	Technical	<del>Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under a permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the</del>	This section refers to prohibition as phytosanitary measures and the deleted text does not refers to prohibition.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.		
608.	123	Technical	Importers may request the NPPO of the importing country to permit seeds for research or specialized commercial purposes. The NPPO may allow the entry of such seeds under a <u>importation</u> permit, which should include specific conditions to prevent the introduction and spread of regulated pests. When a PRA determines that the seeds pose a high risk of becoming plants as pests, prohibition may be considered as a phytosanitary measure.	More appropriate term	OIRSA
609.	124	Substantive	<b>3. <u>Principle of Equivalence of Phytosanitary Measures</u></b>	Deletion of the wording: "of phytosanitary measures" the reason being that is a principle of ISPM 1.	South Africa
610.	124	Technical	<b>3. Equivalence of Phytosanitary Measures</b>	ISPM 24 should be referenced in this section	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
611.	125	Editorial	<u>Options of e</u> Equivalence of phytosanitary measures <u>are</u> particularly important for the international movement of seeds because of the <u>global</u> aspects of <u>globalized the</u> seed trade <u>including with</u> frequent re-export from <u>a single the same</u> seed lot.	Better wording for clarity	EPPO, Georgia, European Union, Serbia, Algeria
612.	125	Substantive	Equivalence of phytosanitary measures is particularly important for the international movement of seeds <u>as seed compnies may have breeding and multiplication programmes in s</u> <u>everal countries, and distribute these seeds to various countries. because of the</u> <u>global aspects of the seed trade with frequent re-export from the same seed lot.</u>	Deletion of and addtion of the highlighted wording for consistency with paragraph 37 and aligned with context on the background of this standard.	South Africa
613.	125	Technical	Equivalence of phytosanitary measures is particularly important for the international movement of seeds because of the global aspects of the seed trade with frequent re-export from the same seed lot.  <u>As different phytosanitary measures could be equivalent NPPOs are encouraged to provide multiple options when defining phytosanitary measures, and if the need arises to use the procedures described in ISPM 24:2011 to determine the equivalence of an additional option to existing ones.</u>	The availability of equivalent or alternative requirements to comply with phytosanitary requirements of the importing country greatly enhances flexibility when (re-exporting seeds to multiple destination countries which may have differing (or differently formulated) requirements. As the process of bilateral acceptance of equivalent measures is tedious, countries should be encouraged to provide multiple or equivalent options when establishing their phytosanitary	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				requirements. ISPM 24 outlines the procedure to be applied to determine the equivalency of later additional measures to the existing set of multiple options. Another reason for including alternative options is that the phytosanitary status of seeds may change over time due to the application of seed treatments. A phytosanitary measure which may be suitable for untreated seeds (e.g. field inspection) may not be appropriate for treated seed. Then the option to test seed in a laboratory is an alternative that should be available. See also [126]	
614.	125	Technical	Equivalence of phytosanitary measures is particularly important for the international movement of seeds because of the global aspects of the seed trade with frequent re-export from the same seed lot (ISPM 1: 2006).	Reference to ISPM 1 added because is relevant for the principle of equivalence.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
615.	125	Technical	Equivalence of phytosanitary measures, according to ISPM 24:2005, is particularly important for the international movement of seeds because of the global aspects of the seed trade with frequent re-export from the same seed lot.	Reference to ISPM 24 is relevant here because this is the basis for this paragraph and special elements of this ISPM are stressed here fo seeds.	European Union
616.	126	Editorial	<del>For seeds, an</del> example of an equivalent phytosanitary measure is <del>the substitution of a requirement for field inspection of the seed crop plants for a target pest</del> in the country of origin with an appropriate seed testing or an effective seed treatment for the target pest.	Better wording for clarity	EPPO, Georgia, European Union, Serbia
617.	126	Substantive	For seeds, an example of an equivalent phytosanitary measure is substituting a requirement for field inspection of plants for a target pest in the country of origin with an appropriate seed test or an effective seed treatment for the target pest.  <u>NPPOs are encouraged to allow for equivalent phytosanitary measures as options when setting their import requirements to promote safe international movement of seeds.</u>	Although this is a general IPPC principle, this is an essential element for movement of seeds due to its characteristics. Therefore it is good to specifically mention it here.	EPPO, Georgia, European Union, Norway, Serbia
618.	126	Substantive	For seeds, an example of an equivalent phytosanitary measure is substituting a requirement for field inspection of plants for a target pest in the country of origin with an appropriate seed test or an effective seed treatment for the target pest.	NPPO should define equivalent phytosanitary measures.	ISTA*
619.	126	Substantive	<del>For seeds, an example of an</del> equivalent phytosanitary measure <del>is substituting a</del> can provide the NPPO with alternative options which will achieve the appropriat	Deletion and addition of the highlighted words, to provide contextual clarification and use correct	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			e level of protection as determined by the PRA, e.g. an alternative requirement for field inspection of plants for a <del>target</del> regulated pest in the country of origin such as with an appropriate seed test or an effective seed treatment for the regulated <del>target</del> pest may be used.	phytosanitary terminology in this standard.	
620.	126	Substantive	For seeds, an example of an equivalent phytosanitary measure is substituting a requirement for field inspection of plants for a target pest in the country of origin with an appropriate seed test or an effective seed treatment for the target pest. <u>For further guidance on the equivalence of phytosanitary measures refer to ISPM 24:2005.</u>	For better guidance	OIRSA
621.	126	Technical	For seeds, an example of an equivalent phytosanitary measure is substituting a requirement for field inspection of plants for a target pest in the country of origin with an appropriate seed test or an effective seed treatment for the target pest <u>or conversely, the substitution of a requirement for seed testing with an appropriate field inspection of the seed crop.</u>	Addition to clarify that substitution can be both ways.	EPPO, Georgia, European Union, Norway, Serbia
622.	126	Technical	For seeds, an example of an equivalent phytosanitary measure is substituting a requirement for field inspection of plants for a <u>regulated</u> <del>target</del> pest in the country of origin with an appropriate seed test or an effective seed treatment for the <u>regulated</u> <del>target</del> pest.	To use the right concept	NEPPO, Bahrain, Morocco
623.	126	Technical	<u>NPPOs are encouraged to include two or more equivalent measures for seeds as part of their import regulations.</u> For seeds, an example of <del>an</del> equivalent phytosanitary measure <u>may be</u> <del>is substituting</del> a requirement for field inspection, <del>of plants for a target pest in the country of origin with</del> an appropriate seed test or an effective seed treatment <del>for the target pest.</del> <u>More guidance on equivalence of phytosanitary measures is given on ISPM 24: 2005.</u>	Paragraph reworded for consistency with ISPM 24:2005.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
624.	126	Technical	For seeds, an example of an equivalent phytosanitary measure is substituting a requirement for field inspection of plants for a target pest in the country of origin with an appropriate seed test or an effective seed treatment for the target <u>regulated</u> pest.	to use the right concept	Algeria
625.	127	Substantive	<del>4. Specific Requirements</del>	No need for this paragraph, because the inspection under this paragraph is a phytosanitary measures and should be under section 2.	NEPPO, Bahrain, Morocco
626.	127	Substantive	<del>4. Sampling, inspection and testing</del> <u>specific Requirements</u>	Request clarity on whether the title "specific requirements", is an introductory paragraph and if so the South Africa would like to propose that the title be changed to sampling, inspection and testing in order to align it with the rest of the context.	South Africa
627.	129	Technical	Inspection may be conducted on the seed <del>lot</del> <u>consignment</u> or as field inspection of the growing crop. ISPM 23:2005 and ISPM 31:2008 provide further guidance on	Import and export inspections are conducted for the consignment which, according to ISPM 5, may	COSAVE, Brazil, Uruguay, Chile,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			inspection and sampling.	be composed of one or more lots.	Peru, Argentina
628.	131	Editorial	Seed lots <del>may can</del> be examined for the presence of <del>plants as pests (e.g. weeds, invasive alien plants)</del> <del>weed seeds</del> and seeds <del>may can</del> be examined for signs or symptoms of regulated pests or regulated articles (e.g. sclerotia, soil). <del>Examining for pest symptoms may be</del> <del>This is</del> an effective method where <del>infested</del> seeds are known to display characteristic symptoms such as discoloration or shrivelling. For example, infection from <i>Cercospora kikuchii</i> in soybean seeds causes purple seed stain. <i>Phomopsis longicolla</i> of soybean and <i>Arachis hypogaeae</i> and <i>Cylindrocladium parasiticum</i> in peanut can discolour and shrivel seeds.	'May' is better than 'can' and 'weeds' is not clear enough	EPPO, Georgia, European Union, Serbia, Algeria
629.	131	Editorial	Seed lots can be examined for the presence of weed seeds and seeds can be examined for signs or symptoms of regulated pests or regulated articles (e.g. sclerotia, soil). This is an effective method where seeds are known to display characteristic symptoms such as discoloration or shrivelling. For example, infection from <i>Cercospora kikuchii</i> in soybean seeds causes purple seed stain <del>and</del> <i>Phomopsis longicolla</i> of soybean and <i>Arachis hypogaeae</i> and <i>Cylindrocladium parasiticum</i> in peanut can discolour and shrivel seeds.	Add "and" and delete "." for clarity.	Canada
630.	131	Editorial	On peut examiner les lots de semences pour détecter la présence éventuelle de semences d'adventices et on peut examiner les semences pour déceler des signes ou des symptômes éventuels de la présence d'organismes nuisibles réglementés ou d'articles réglementés (par exemple, sclérotés, terre). Cette méthode est efficace quand on sait que les semences peuvent présenter des symptômes caractéristiques tels qu'une décoloration ou un flétrissement. Par exemple, l'infection de semences de soja par <i>Cercospora kikuchii</i> entraîne l'apparition de taches pourpres. <i>Phomopsis longicolla</i> sur le soja et <i>Arachis hypogaeae</i> et <i>Cylindrocladium parasiticum</i> sur l'arachide peuvent entraîner une décoloration et un flétrissement des semences.	Pour la cohérence ou bien on met les noms latins pour les deux plantes ou on utilise les noms communs.	Burundi
631.	131	Editorial	On peut examiner les lots de semences pour détecter la présence éventuelle de semences d'adventices et on peut examiner les semences pour déceler des signes ou des symptômes éventuels de la présence d'organismes nuisibles réglementés ou d'articles réglementés (par exemple, sclérotés, terre). Cette méthode est efficace quand on sait que les semences peuvent présenter des symptômes caractéristiques tels qu'une décoloration ou un flétrissement. Par exemple, l'infection de semences de soja par <i>Cercospora kikuchii</i> entraîne l'apparition de taches pourpres. <i>Phomopsis longicolla</i> sur le soja et <del>arachide</del> <i>Arachis hypogaeae</i> et <i>Cylindrocladium parasiticum</i> sur l'arachide peuvent entraîner une décoloration et un flétrissement des semences.	pour d'avantage de cohérence car on n'a pas utilisé le nom scientifique pour désigner le soja	Gabon

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
632.	131	Substantive	Seed lots can be examined for the presence of weed seeds and seeds can be examined for signs or symptoms of regulated pests or regulated articles (e.g. sclerotia, soil). This is an effective method where seeds are known to display characteristic symptoms such as discoloration or shrivelling. For example, infection from <i>Cercospora kikuchii</i> in <i>Glycine max</i> (soybean) seeds causes purple seed stain. <i>Phomopsis longicolla</i> of soybean and <i>Arachis hypogaeae</i> (peanut) and <i>Cylindrocladium parasiticum</i> in peanut can discolour and shrivel seeds.	Inclusion of scientific and common names is inline with IPPC style guide	Ghana
633.	131	Technical	Seed lots can be examined for the presence of weed seeds and seeds can be examined for signs or symptoms of regulated pests or regulated articles (e.g. <del>sclerotia</del> , soil <u>or the presence of regulated pests as contaminants (e.g. sclerotia)</u> ). This is an effective method where seeds are known to display characteristic symptoms such as discoloration or shrivelling. For example, infection from <i>Cercospora kikuchii</i> in soybean seeds causes purple seed stain. <i>Phomopsis longicolla</i> of soybean and <i>Arachis hypogaeae</i> and <i>Cylindrocladium parasiticum</i> in peanut can discolour and shrivel seeds.	Sclerotia are not regulated articles but is a pest that can be present as contaminant.	EPPO, Georgia, Serbia, Algeria
634.	131	Technical	Seed lots can be examined for the presence of weed seeds and seeds can be examined for signs or symptoms of regulated pests or regulated articles (e.g. sclerotia, soil). This is an effective method where seeds are known to display characteristic symptoms such as discoloration or shrivelling. For example, infection from <i>Cercospora kikuchii</i> in soybean seeds causes purple seed stain. <i>Phomopsis longicolla</i> of soybean and <i>Arachis hypogaeae</i> and <i>Cylindrocladium parasiticum</i> in peanut can discolour and shrivel seeds. <u>However symptoms and signs should be confirmed by laboratory test.</u>	Last sentence added because although a quarantine pest display characteristic symptoms on the seed no phytosanitary measure should be taken without the corresponding laboratory test.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
635.	131	Technical	Seed lots can be examined for the presence of weed seeds and seeds can be examined for signs or symptoms of regulated pests or regulated articles (e.g. <del>sclerotia</del> , soil) <u>or the presence of regulated pests as contaminants (e.g. sclerotia)</u> . This is an effective method where seeds are known to display characteristic symptoms such as discoloration or shrivelling. For example, infection from <i>Cercospora kikuchii</i> in soybean seeds causes purple seed stain. <i>Phomopsis longicolla</i> of soybean and <i>Arachis hypogaeae</i> and <i>Cylindrocladium parasiticum</i> in peanut can discolour and shrivel seeds.	Sclerotia are not regulated articles but is a pest that can be present as contaminant.	European Union
636.	132	Editorial	Visual examination can be done <u>with or without the help of</u> <del>manually or using</del> devices that automatically sort seeds based on visual physical characteristics. Visual examination should be combined with other testing methods if screening for asymptomatic or unreliably symptomatic regulated pests is required. Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.	Better wording for readability.	EPPO, Georgia, European Union, Serbia, Algeria



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
637.	132	Editorial	Visual examination can be done manually or <del>by</del> using devices that automatically sort seeds based on visual physical characteristics. Visual examination should be combined with other testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.	Editorial correction	ISF*
638.	132	Editorial	Visual examination can be done manually or using devices that automatically sort seeds based on <del>visible</del> <del>visual</del> physical characteristics. Visual examination should be combined with other testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.	Visible is more appropriate here as it is describing physical characteristics that can be seen.	Australia
639.	132	Substantive	Visual examination can be done <del>by inspectors manually</del> or using devices that automatically sort seeds based on <del>visible</del> <del>ual</del> physical characteristics. Visual examination should be combined with other testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. <del>Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.</del>	To reflect that it is the inspector doing the visual inspection and sorting seeds based on visible & not visual characteristics. Last sentence is not relevant.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
640.	132	Substantive	<del>Visual examination can be done manually or using devices that automatically sort seeds based on visual physical characteristics.</del> Visual examination should be combined with other testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.	Deletion of the first sentence, the reason being that in terms of ISPM 5 terminology visual inspection encompasses all other devises used.	South Africa
641.	132	Substantive	Visual examination can be done manually or using devices that automatically sort seeds based on visual physical characteristics. Visual examination should be combined with other testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. <del>Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.</del>	Not relevant when sampling size can be established.	Australia
642.	132	Technical	Visual examination can be done manually or using devices that automatically sort seeds based on visual physical characteristics. Visual examination should be combined with other testing methods if <del>pest freedom or a specific tolerance screening</del> for asymptomatic or unrelially symptomatic regulated pests is required. <del>Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.</del> <u>Certain pests (e.g. nematodes) are not detectable by inspection with the naked eye and may require a more specialized visual examination e.g. with a binocular microscope.</u>	First change: needed to accomodate both Qs and RNQPs Second change, sentence on small and large seeds lots is not clear and not needed. Third change: Additional sentence taken over from paragraph 133, fits better together with 132.	EPPO, Georgia, Serbia, Algeria



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
643.	132	Technical	Visual examination can be done manually or using devices that automatically sort seeds based on visual physical characteristics. Visual examination should be combined with <del>other</del> testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. <del>Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.</del>	1. to be compatible with the definition of inspection 2. there is no scientific bases to support this affirmation	NEPPO, Bahrain, Morocco
644.	132	Technical	Visual examination can be done manually or using devices that automatically sort seeds based on visual physical characteristics. Visual examination should be combined with <del>other</del> testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.	Visual examination is not considered a testing method.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
645.	132	Technical	Visual examination can be done manually or using devices that automatically sort seeds based on visual physical characteristics. Visual examination should be combined with other testing methods if <u>pest freedom or a specific tolerance screening</u> for asymptomatic or unrelially symptomatic regulated pests is required. <del>Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.</del> <u>Certain pests (e.g. nematodes) are not detectable by inspection with the naked eye and may require a more specialized visual examination e.g. with a binocular microscope.</u>	First change: needed to accomodate both QPs and RNQPs Second change, sentence on small and large seeds lots is not clear and not needed. Third change: Additional sentence taken over from paragraph 133, fits better together with 132.	European Union
646.	132	Technical	<del>Visual examination can be done manually or using devices that automatically sort seeds based on visual physical characteristics.</del> Visual examination <u>of seed</u> should be combined with other testing methods if screening for asymptomatic or unrelially symptomatic regulated pests is required. Visual examination can be useful for small seed lots but may need to be combined with other methods for larger lots.	Unnecessary text deletion	OIRSA
647.	133	Editorial	<del>Certain pests (e.g. nematodes) are not detectable by simple inspection and may require a more specialized laboratory examination.</del>	Moved to paragraph 132	EPPO, Georgia, European Union, Serbia, Algeria
648.	133	Substantive	Certain pests (e.g. nematodes <u>or plants as pests</u> ) are not detectable by simple inspection and may require a more specialized laboratory examination.	Add "plants as pests" because some weed seeds need specialized laboratory examination for identification.	Canada
649.	133	Substantive	Certain pests (e.g. nematodes) are not detectable by <u>visual</u> <del>simple</del> inspection and may require a more specialized laboratory examination.	• Replacement of the word "simple" with "visual", in order to use appropriate phytosanitary terminology.	South Africa
650.	133	Technical	Certain pests (e.g. nematodes, <u>viruses, bacteria and fungi</u> ) are not detectable by simple inspection and may require a more specialized laboratory examination.	To include other pest types.	Singapore, China,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Japan
651.	133	Technical	Certain pests (e.g. nematodes) are not detectable by <del>simple</del> inspection and may require a more specialized laboratory examination.	For consistency with the term inspection in the glossary	NEPPO, Bahrain, Morocco, Algeria
652.	133	Technical	Certain pests (e.g. nematodes, <u>viruses, viroids, bacteria and fungi</u> ) are not detectable by simple inspection and may require a more specialized laboratory examination.	To include other pest types.	Thailand
653.	133	Technical	Certain pests (e.g. nematodes) are not detectable by simple inspection and may require a more specialized laboratory examination.	Regarding: "Certain pests (e.g. nematodes ..." Comment: Not only	ISTA*
654.	133	Technical	<del>Certain pests</del> <u>The majority of seed-borne pests (e.g. nematodes)</u> are not detectable by <del>simple</del> inspection and may require <del>a more specialized</del> laboratory <del>testing</del> <u>examination</u> .	The majority of seed-borne pests will require laboratory testing (e.g. nematodes, virus, bacterias, fungi, etc).	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
655.	133	Technical	Certain pests (e.g. nematodes, <u>viruses, bacteria, fungi, etc</u> ) are not detectable by simple inspection and may require a more specialized laboratory examination. <u>Inspection after washing or breaking may be necessary.</u>	provide more examples and clarity	Korea, Republic of, Ghana, Belize
656.	133	Technical	Certain pests (e.g. nematodes, <u>viruses, bacteria, pytoplasms</u> ) are not detectable by <del>simple</del> inspection and may require a more specialized laboratory examination.	For improving the example. Term not defined in the ISPM 5.	OIRSA
657.	133	Technical	Certain pests (e.g. nematodes, <u>viruses, bacteria and fungi</u> ) are not detectable by simple inspection and may require a more specialized laboratory examination.	The suggested wording change incorporates other pest groups that can be difficult to detect from simple inspection and makes this wording consistent with paragraph [149], 2nd sentence.	Australia
658.	134	Substantive	<del>Inspection of coated seeds may not be appropriate</del> <u>Inspection of seeds that are coated, pelleted, or embedded in tape, mats or any other substrate may require removing the covering by washing and breaking</u> because <del>the coating</del> <u>the covering</u> material reduces the ability to see the seed or symptoms of the pest on the seed.	In addition to coated seeds, pelleted seeds, seed tapes and seed mats also reduce the ability to see the seed or the symptoms of a pest on the seed. In this case, inspection of seeds is possible after removing the covering by washing and breaking those covering material.	Japan
659.	134	Technical	Inspection of coated, <u>peletted or treated</u> seeds may not be appropriate because the coating <u>or peletting</u> material <u>or treatment may</u> reduces the ability to see the seed or symptoms of <u>any</u> <del>the</del> pest <u>associated with</u> <del>on</del> the seed.	To cover not only coating but also peletting and treatments	EPPO, Georgia, European Union, Norway, Serbia, Algeria
660.	134	Technical	Inspection of coated <u>or pelleted or treated</u> seeds may not be appropriate because the coating <u>or pelleting</u> material <u>or treatment may reduce</u> <del>reduces</del> the ability to see the seed or symptoms of the pest on the seed.	Not all treatments are 'clear' and a coloured or layered treatment can obscure a disease symptom or the presence of unwanted weed seeds or soil	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				particles.	
661.	134	Technical	Inspection of coated seeds may not be appropriate because the coating material reduces the ability to see the seed or symptoms of the pest on the seed.	Regarding: "Inspection of coated seeds ..." Comment: Not only	ISTA*
662.	134	Technical	Inspection of coated <u>or pelleted</u> seeds may not be appropriate because the coating material reduces the ability to see the seed or symptoms of the pest on the seed.	Pelleted seeds is another example.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
663.	135	Editorial	<u>In such cases,</u> <del>The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, to assess the pest risk and in order to determine if import requirements are met</del> <u>will be necessary.</u>	Better wording for clarity	EPPO, Georgia, European Union, Serbia, Algeria
664.	135	Editorial	The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, <u>or pelleting or treatment</u> to assess the pest risk and in order to determine if import requirements will be necessary.	Consistent with the change made in [134].	ISF*
665.	135	Substantive	<del>The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, to assess the pest risk and in order to determine if import requirements will be necessary.</del>	Do not need to provide a sample of the seeds before coating to PRA.	Viet Nam
666.	135	Substantive	<del>The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, to assess the pest risk and in order to determine if import requirements will be necessary.</del>	This paragraph should be deleted or may be moved to section 1 pest risk analysis, if necessary. This is because PRA is generally conducted through submitted documents from NPPO of exporting country. Inspection of sample of seeds before coating may be provided misleading information because a sample may be well prepared or selected.	Thailand
667.	135	Substantive	The NPPO of the importing country may request the NPPO of the exporting country to provide a sample <u>or test results</u> of the seeds before coating, to assess the pest risk and in order to determine if <u>phytosanitary</u> import requirements will be necessary.	Add "or test results" because testing before coating is another option. Add "phytosanitary" for clarity.	Canada
668.	135	Substantive	The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, <del>to assess the pest risk and in order to determine if import requirements will be necessary.</del>	redundant	Korea, Republic of, Ghana, Belize
669.	135	Substantive	<del>The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, to assess the pest risk and in order to determine if import requirements will be necessary.</del>	Samples of seeds are not necessary for PRA.	Japan
670.	135	Substantive	<del>The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, to assess the pest risk</del>	Deletion of paragraph 135, the reason being that it's irrelevant in terms of the trade of seeds.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
671.	135	Substantive	<del>and in order to determine if import requirements will be necessary.</del> The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating <u>for inspection and testing</u> ; <del>to assess the pest risk and in order to determine if import requirements will be necessary.</del>	Adding for complementing. Deletion for redundant	OIRSA
672.	135	Substantive	The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating <u>for inspection</u> , <del>to assess the pest risk and in order to determine if import requirements will be necessary.</del>	Seed could be hand-picked for inspection so this would not be used to determine whether import requirements were necessary. Delete.	Australia
673.	135	Technical	The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds <u>of a size proportional to the seed count</u> before coating, to assess the pest risk and in order to determine if import requirements will be necessary.	Pelleted or coated seeds are heavier than "naked" seeds and therefore the sample of naked seed should be drawn based on seed count.	ISF*
674.	135	Technical	The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, to assess the pest risk and in order to determine if import requirements will be necessary.	Regarding: "...a sample of the seeds before coating, " Comment: Not only	ISTA*
675.	135	Technical	<del>The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, to assess the pest risk and in order to determine if import requirements will be necessary.</del>	Deleted text because phytosanitary import requirements are established based on information provided by the NPPO of the exporting country and not on seed lots to be exported.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
676.	135	Technical	The NPPO of the importing country may request the NPPO of the exporting country to provide a sample of the seeds before coating, <u>pelleting or treating</u> , to assess the pest risk and in order to determine if import requirements will be necessary.	To express that this not only applies to coating but equally to pelleting and treating.	European Union
677.	137	Editorial	Inspection of plants in the field may be a useful phytosanitary measure for quarantine pests known to produce visible symptoms. The use of this measure requires staff <u>who are</u> trained to recognize the pests of concern as well as identify the appropriate time to monitor for the pests during crop growth.	Add "who are" to the second sentence for clarity.	Canada
678.	137	Substantive	Inspection of plants in the field may be a useful phytosanitary measure for quarantine pests known to produce visible symptoms. The use of this measure requires staff trained to recognize the pests of concern <u>and the symptoms observed</u> as well as identify the appropriate time to monitor for the pests during crop growth.	Skills in identifying signs and symptoms of pests of concern are both required for effective differential diagnosis.	Ghana
679.	137	Substantive	L'inspection des végétaux au champ peut constituer une mesure phytosanitaire utile s'agissant d'organismes <u>nuisibles</u> de quarantaine connus pour produire des symptômes visibles. L'application de cette mesure suppose que le personnel soit formé à reconnaître les organismes nuisibles visés <u>ou leurs symptômes</u> et sache à quels moments de la croissance des cultures, il convient de procéder à cette surveillance.	Les deux méthodes peuvent permettre l'application de la mesure phytosanitaire	Burundi

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
680.	137	Substantive	L'inspection des végétaux au champ peut constituer une mesure phytosanitaire utile s'agissant d'organismes de quarantaine connus pour produire des symptômes visibles. L'application de cette mesure suppose que le personnel soit formé à reconnaître les organismes nuisibles visés <u>ou leurs symptômes</u> et sache à quels moments de la croissance des cultures, il convient de procéder à cette surveillance.	es deux méthodes peuvent permettre l'application de la mesure phytosanitaire	Gabon
681.	137	Substantive	Inspection of plants in the field may be a useful <u>to detect regulated</u> <del>phytosanitary measure for quarantine</del> pests known to produce visible symptoms. <del>The use of this measure</del> <u>This</u> requires staff trained to recognize the <u>regulated</u> pests of <del>concern</del> as well as identify the appropriate time to monitor for the pests during crop growth.	Replacement of the word "quarantine" with "regulated". The terminology as defined in ISPM 5. (2013). Glossary of phytosanitary terms includes both quarantine and regulated non--quarantine pests. Deletion of "phytosanitary measure for quarantine" and "use of this measure" and addition of "to detect" for contextual clarification and use of correct phytosanitary terminology.	South Africa
682.	137	Technical	Inspection of <u>the seed crop</u> <del>plants</del> in the field <del>is</del> <u>may be</u> a useful phytosanitary measure for <u>those regulated</u> <del>quarantine</del> pests known to <del>cause</del> <u>produce</u> visible symptoms. The use of this measure requires staff trained to recognize the pests of concern as well as <u>to</u> identify the appropriate time to <u>inspect</u> <del>monitor</del> for the pests during crop growth.	More precise and correct wording.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
683.	137	Technical	Inspection of plants in the field may be a useful phytosanitary measure for quarantine pests known to produce visible symptoms. The use of this measure requires <u>trained</u> staff <del>trained</del> to recognize the pests of concern as well as <del>identify</del> <u>know</u> the appropriate time to monitor for the pests during crop growth.  <u>It should be noted that a pest observed in the field does not necessarily transmit to the seed or may be treated effectively.</u>  <u>In case seed is harvested from a field with visual symptoms of a disease observed during field inspection, it should be tested if justified according to the PRA.</u>	1. (modification to text) The use of this measure requires staff trained to recognize the pests of concern at the appropriate time during crop growth. 2. (first new sentence added) As explained in section 1.1. (Seeds as pathways) as well as in the schedule of Annex 1.2, a plant may be host to a pest but this pest is not necessarily transmitted to a next generation of plants via seed. 3. (second new sentence added) A pest or disease observed during field inspection that is not necessarily transmitted to the seed or can be treated effectively should be tested on a representative seed sample. The PRA will provide the justification for which pests this may apply.	ISF*
684.	137	Technical	Inspection of plants in the field may be a useful phytosanitary measure for <del>quarantine</del> <u>regulated</u> pests known to produce visible symptoms. The use of this measure requires staff trained to recognize the pests of concern as well as identify the appropriate time to monitor for the pests during crop growth.	RNQP are also relevant.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
685.	138	Technical	<b>4.2 Sampling of lots</b>	More precise wording.	European Union

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
686.	139	Editorial	Because it is difficult to inspect a seed consignment, inspection for the detection of pests is usually based on some type of sampling. Sampling for inspection may be statistically based or dictated by operational feasibility. Sampling implies a threshold for the level of detection of infestation <u>(contamination)</u> , <u>or</u> , infection- <del>or contamination</del> .	Self explanatory	ISTA*
687.	139	Editorial	Because it is difficult to inspect <del>an a entire</del> seed consignment, inspection for the detection of pests is usually based on some type of sampling. Sampling for inspection may be statistically based or dictated by operational feasibility. <del>Sampling</del> <u>Sample size means</u> implies a threshold for the level of detection of infestation, infection or contamination.	Editorial correction.	Japan
688.	139	Substantive	<del>Because it is difficult to inspect a seed consignment, inspection for the detection of pests is usually based on some type of sampling. Sampling for inspection may be statistically based or dictated by operational feasibility. Sampling implies a threshold for the level of detection of infestation, infection or contamination.</del>	No need for this paragraph. It is enough to point out to the Guidance on sampling of consignments for inspection in ISPM 31	NEPPO, Bahrain, Morocco
689.	139	Substantive	<del>Because it is difficult to inspect a seed consignment, inspection for the detection of pests is usually based on some type of sampling.</del> <u>Sampling methodologies used by the NPPOs will depend on the sampling bjectives (e.g. sampling for testing or inspection) and may be solely statistical ly based or developed noting particular operational constraints.</u> <del>Sampling for inspection may be statistically based or dictated by operational feasibility.</del> Sampling implies a threshold for the level of detection of infestation, infection or contamination.	Deletion of the first and the last sentence, the reason being that it is not relevant to the paragraph. Insertion of "Sampling methodologies used by the NPPOs will depend on the sampling objectives (e.g. sampling for testing or inspection) and may be solely statistically based or developed noting particular operational constraints" to provide relevant sentence to the paragraph.	South Africa
690.	139	Technical	Because it is difficult to inspect a seed consignment, inspection for the detection of pests is usually based on some type of sampling. Sampling for inspection may be statistically based or dictated by operational feasibility. Sampling implies a threshold for the level of detection of infestation, <del>infection</del> or contamination.	included under "infestation" in ISPM No 5	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize
691.	139	Technical	<del>Because it is difficult to inspect a seed consignment, i</del> Inspection for the detection of pests is usually based on <del>some type of</del> sampling. Sampling for inspection may be statistically based or dictated by operational feasibility. Sampling implies <u>an efficacy threshold for the level of detection below 100%</u> <del>of infestation, infection or contamination.</del>	The explanation for doing sampling is unclear and unnecessary.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
692.	139	Technical	Because it is difficult to inspect a seed consignment, inspection for the detection of pests is usually based on some type of sampling. Sampling for inspection may be statistically based or dictated by operational feasibility. Sampling implies a threshold for the level of detection of infestation, <del>infection</del> or contamination.	According ISPM 5 the term "infestation" includes "infection" .	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
693.	139	Technical	Because it is difficult to inspect a seed consignment, inspection for the detection of pests is usually based on some type of sampling. Sampling for inspection may	The definition for infestation in ISPM 5 includes infection so unnecessary to have infection.	Australia



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			be statistically based or dictated by operational feasibility. Sampling implies a threshold for the level of detection of infestation, <del>infection</del> or contamination.		
694.	140	Substantive	Guidance on sampling of consignments for inspection is given in ISPM 31:2008.  <u>In addition, the International Rules for Seed Testing (ISTA rules) Chapter 2: Sampling includes internationally accepted sampling methods that may be used.</u>	1. Add reference to ISTA rules because they are another important reference for sampling of seeds. It is already provided in the reference section of the standard.	Canada
695.	140	Substantive	Guidance on sampling of consignments for inspection is given in ISPM 31:2008 <u>and ISTA rules.</u>	Addition of "and ISTA rules", the reason being that rules of sampling as defined by ISTA are focussed on obtaining a representative sample for testing seeds from individual seed lot. In addition ISPM 31 is focussed on sampling consignments of multiple lots.	South Africa
696.	140	Technical	Guidance on sampling of consignments for inspection is given in ISPM 31:2008. <u>Specific guidance on sampling of seeds is given in ISTA's International Rules for Sampling.</u>	ISPM 31 gives general guidance on sampling for all plants, ISTA gives specific guidance on sampling of seed lots.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
697.	140	Technical	Guidance on sampling of consignments for inspection is given in ISPM 31:2008. <u>Specific guidance on sampling of seed is given in ISTA's International Rules for Sampling.</u>	ISPM 31: 2008 is focussed on sampling consignments of multiple lots. The rules for sampling defined by ISTA are focussed on obtaining a representative sample for testing seeds from an individual seed lot. This is a useful additional resource. See also reference in Appendix 1.	ISF*
698.	141	Substantive	<b>4.2.1 Sampling of small lots</b>  <u>Paragraphs (141-147) should be deleted</u>	The sampling procedures are elaborated in the ISPM 31	NEPPO, Bahrain, Morocco, Algeria
699.	141	Substantive	<del>4.2.1 Sampling of small lots</del>	Deletion of this paragraph, the reason being that the guidelines have already been provided in terms of sampling of small lots and sampling of seeds in sealed containers as per ISPM 31.	South Africa
700.	141	Technical	<del>4.2.1 Sampling of small lots</del>	It is already capture n the ISPM 31 : 2008	New Caledonia*
701.	141	Technical	<b>4.2.1 Sampling of <u>Consignments with small quantity of seeds</u> <del>lots</del></b>	What it is sampled is the consignment.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
702.	142	Editorial	Testing of samples <del>that are taken according to ISPM 31:2008, from small lots when statistically valid samples are required as per ISPM 31:2008</del> may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:	More readable sentence.	European Union
703.	142	Editorial	Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of <del>an unacceptably a</del> large proportion of the lot. In such cases, equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:	Editorial correction	Japan
704.	142	Substantive	<del>Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:</del>  <u>Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008. Equivalent measures could be explored as per ISPM 24.</u>	For more clarity and reference to ISPM no 24.	Singapore, China, Korea, Republic of, Ghana, Belize
705.	142	Substantive	Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent <del>means</del> <u>measures as per ISPM 24</u> of meeting phytosanitary import requirements should be explored. Some examples are:	For more clarity and reference to ISPM no 24.	Thailand
706.	142	Substantive	Testing of samples taken from small lots <u>(for example, 50 or fewer packets in the shipment)</u> when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:	A clear definition of small seed lots would be very beneficial to NPPOS. (we have provided the US NPPO phytosanitary definition, as a suggestion)	United States of America
707.	142	Substantive	<del>Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:</del>	Deletion of this paragraph, the reason being that the guidelines have already been provided in terms of sampling of small lots and sampling of seeds in sealed containers as per ISPM 31.	South Africa
708.	142	Substantive	Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, <u>non-</u>	For better guidance	OIRSA

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>statistical sampling alternatives should be revised, as indicated in ISPM 31:2008. equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:</del>		
709.	142	Substantive	Particular guidance on sampling small lots is provided in ISPM 31:2008, Appendix x 2: Calculating sample sizes for small lots.  <del>Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:</del>	4.2.1 Guidance on sampling of small lots is provided in ISPM 31 Appendix 2 and it is more appropriate for a quarantine standard to refer to that than discussing 'destruction of unacceptably large proportion of the lot'.	Australia
710.	142	Technical	<del>Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent means of meeting phytosanitary import requirements should be explored. Some examples are:</del>	It is already capture in the ISPM 31:2008	New Caledonia*
711.	142	Technical	Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, equivalent <del>means of meeting</del> phytosanitary <del>procedures import requirements</del> should be <del>considered by the NPPO of the importing country</del> explored. Some examples are:	Clearer what is actually needed.	EPPO, Georgia, European Union, Norway, Serbia
712.	142	Technical	Testing of samples taken from small lots when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of an unacceptably large proportion of the lot. In such cases, <u>other sampling methods for equivalent</u> <del>means of</del> meeting phytosanitary import requirements should be explored. Some examples are:	The methods described are not phytosanitary measures but alternative sampling methods.	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize
713.	142	Technical	Testing of samples taken from small <del>lots consignments</del> when statistically valid samples are required as per ISPM 31:2008 may result in the destruction of <del>an unacceptably</del> large proportion of the <del>lot consignment</del> . In such cases, <del>equivalent other</del> means of <del>meeting phytosanitary import requirements</del> <del>sampling should may</del> be explored. <del>Some examples are: for example, a fixed proportion samples (a given % of the consignment), reduced sample size. In cases where sampling from small consignments is not possible, specific post entry quarantine conditions may be determined.</del>	Lot was replaced by consignment according to comment in Para 129. Text deleted because examples described are other means of sampling. Examples between brackets were moved from paragraphs 143 and 144. Last sentence added because where sampling is not possible specific post entry quarantine conditions is an option	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
714.	143	Substantive	<del>1. fixed proportion samples (e.g. 10% of the seed lot)</del>	redundant.	Singapore, China, Korea, Republic of,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Ghana, Belize
715.	143	Substantive	1. fixed proportion samples (e.g. 10% <u>or less</u> of the seed lot)	Sample size depends on the inoculum threshold of seedborne pathogens, and less than 10% of the sample may be adopted for small lot inspection in some cases.	Japan
716.	143	Substantive	<del>1. fixed proportion samples (e.g. 10% of the seed lot)</del>	Deletion of this paragraph, the reason being that the guidelines have already been provided in terms of sampling of small lots and sampling of seeds in sealed containers as per ISPM 31.	South Africa
717.	143	Technical	<del>1. fixed proportion samples (e.g. 10% of the seed lot)</del>	It is already capture in the ISPM 31:2008	New Caledonia*
718.	143	Technical	1. fixed proportion samples (e.g. 10% <u>or less</u> of the seed lot)	A smaller percentage may be necessary in case of very small lots.	ISF*
719.	143	Technical	<del>1. fixed proportion samples (e.g. 10% of the seed lot)</del>	Moved as an example at the end of paragraph 142. Text between brackets was modified for better guidance.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
720.	143	Technical	<del>1. fixed proportion samples (e.g. 10% of the seed lot)</del>	superceded by comment on [142]	Australia
721.	144	Substantive	1. <u>reduced sample size, such as the number of seeds being sampled being maximized at ten times the number of mother plants from which the seeds were harvested (e.g. 20,000 seeds harvested from 50 plants, the maximum sample size is then 500 seeds).</u>	To give guidance on the way to reduce the sample size.	EPPO, Georgia, European Union, Serbia
722.	144	Substantive	1. <del>reduced sample size</del>	Deletion of this paragraph, the reason being that the guidelines have already been provided in terms of sampling of small lots and sampling of seeds in sealed containers as per ISPM 31.	South Africa
723.	144	Technical	1. <del>reduced sample size</del>	It is already capture in the ISPM 31:2008	New Caledonia*
724.	144	Technical	1. <u>reduced sample size, such as sample size maximized at the number of seeds sampled being ten times the number of mother plants from which the seeds have been harvested (e.g. 20,000 seeds have been harvested from 50 plants; the maximised sample size is 500 seeds).</u>	1 (addition of sentence) This part of the text was inadvertently left out from the standard for member consultation. Note: the numbering of the bullet point is incorrect. 2. (change of word in sentence) The word "minimum" in the phrase "the minimum sample size is 500 seeds" has been replaced by "maximized" to be consistent with the	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				first sentence. Note: the numbering of the bullet point is incorrect.	
725.	144	Technical	1. <del>reduced sample size</del>	Moved to end of Para 142.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
726.	144	Technical	1. <del>reduced sample size</del>	Superseded by comment on [142]	Australia
727.	145	Editorial	1. <u>3.</u> testing plant material from mother plants (e.g. plant tissue).	By editorial mistake.	China
728.	145	Editorial	1. <u>3.</u> testing plant <u>tissue</u> material from mother plants ( <del>e.g. plant tissue</del> ).	Clearer and numbering should be corrected.	EPPO, Georgia, European Union, Serbia
729.	145	Editorial	<u>3.</u> testing plant material from mother plants (e.g. plant tissue).	wrong order of numbering.	Thailand
730.	145	Editorial	1. <u>3.</u> testing plant material from mother plants (e.g. plant tissue).	Numbering corrected (from 1 to 3).	ISF*
731.	145	Editorial	1. <u>3.</u> testing plant material from mother plants (e.g. plant tissue).	Numbered list is incorrect.	United States of America
732.	145	Editorial	<u>3.</u> testing plant material from mother plants (e.g. plant tissue).	Editorial correction	Japan
733.	145	Editorial	1. <u>3.</u> analyser du matériel végétal provenant des plants parents (par exemple, le tissu végétal).	c'est le point 3 au lieu de 4. Lever la confusion das la numérotation pour plus de clarté	Gabon
734.	145	Substantive	1. <del>testing plant material from mother plants (e.g. plant tissue).</del>	Deletion of this paragraph, the reason being that the guidelines have already been provided in terms of sampling of small lots and sampling of seeds in sealed containers as per ISPM 31.	South Africa
735.	145	Technical	1. <del>testing plant material from mother plants (e.g. plant tissue).</del>	It is already capture in the ISPM 31:2008	New Caledonia*
736.	145	Technical	1. testing plant material from mother plants (e.g. plant tissue). <u>Plant tissue can include immature seeds prior to physical maturity and that are still attached to the plant.</u>	Provides additional information on plant tissue to be tested.	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
737.	145	Technical	1. <del>testing plant material from mother plants (e.g. plant tissue).</del>	Deleted because it is not example of sampling of consignment. Testing planting material from mother plants could be used to replace sampling for testing.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
738.	145	Technical	1. <del>testing plant material from mother plants (e.g. plant tissue).</del>	Superceded by comment on [142]	Australia
739.	146	Substantive	<del>4.2.2 Sampling of seeds in sealed containers</del>	Deletion of this paragraph, the reason being that the guidelines have already been provided in terms of sampling of small lots and sampling of seeds in sealed containers as per ISPM 31.	South Africa
740.	146	Substantive	<del>4.2.2 Sampling of seeds in sealed containers</del>	This is not a quarantine issue and this guidance potentially misleads importing NPPO's that they need to maintain the sanctity of sealed packaging whilst compromising quarantine sampling requirements.	Australia
741.	146	Technical	<del>4.2.2 Sampling of seeds in sealed containers</del>	The first and foremost come to sampling requirement	New Caledonia*
742.	146	Technical	<del>4.2.2 Sampling of seeds in sealed containers</del>	Content of section 4.2.2 seems a commercial issue rather than technical.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
743.	147	Substantive	<del>NPPOs should consider the phytosanitary security of the consignment when designing sampling protocols (e.g. minimizing the number of sealed (air-tight) bags opened to obtain the required samples).</del>	Deletion of this paragraph, the reason being that the guidelines have already been provided in terms of sampling of small lots and sampling of seeds in sealed containers as per ISPM 31.	South Africa
744.	147	Substantive	<del>NPPOs should consider the phytosanitary security of the consignment when designing sampling protocols (e.g. minimizing the number of sealed (air-tight) bags opened to obtain the required samples).</del>	This is not a quarantine issue and this guidance potentially misleads importing NPPO's that they need to maintain the sanctity of sealed packaging whilst compromising quarantine sampling requirements.	Australia
745.	147	Technical	<del>NPPOs should consider the phytosanitary security of the consignment when designing sampling protocols (e.g. minimizing the number of sealed (air-tight) bags opened to obtain the required samples).</del>	The first and foremost come to sampling requirement.	New Caledonia*
746.	147	Technical	<del>NPPOs should consider the phytosanitary security of the consignment when designing sampling protocols (e.g. minimizing the number of sealed (air-tight) bags opened to obtain the required samples).</del> <u>When sampling seed lots, NPPOs should consider the impact of sampling on the quality of the remaining seed lot, e.g. only opening the necessary number of air tight containers to obtain the</u>	This is a valid element of the standard, but is not linked to the phytosanitary security, it is linked to the quality of the seed lot.	EPPO, Georgia, European Union, Norway, Serbia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<u>required samples.</u>		
747.	147	Technical	<del>NPPOs should consider the phytosanitary security of the consignment when designing sampling protocols (e.g. minimizing the number of sealed (air-tight) bags opened to obtain the required samples).</del>	See comment in Para 146.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
748.	148	Substantive	4.3 <del>Testing</del> <u>Detection</u>	compatibility with the glossary	NEPPO, Bahrain, Morocco, Algeria
749.	148	Substantive	4.3 <del>Testing</del> <u>Detection</u>	• Deletion of “detection” and replace with "Testing", the reason being that testing is done in order to detect regulated pests.	South Africa
750.	148	Technical	4.3 <del>Detection</del> <u>Pest diagnosis</u>	To be consistent to ISPM 5.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
751.	149	Editorial	In <del>some</del> <u>certain</u> cases, inspection may not be sufficient to determine if a pest is present and other forms of <del>examination</del> <u>detection</u> may be needed; for example, laboratory testing. Pest <u>groups</u> such as viruses, bacteria, fungi and some nematodes may not be detect <u>able</u> ed by inspection of seeds <del>but</del> . <del>These pests</del> may <del>instead</del> be detected by specific laboratory tests developed and validated for regulated pests in seeds.	Clearer wording	EPPO, Georgia, European Union, Serbia, Algeria
752.	149	Editorial	In certain cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; <del>for example, (e.g. laboratory testing).</del> Pests such as viruses, bacteria, fungi and some nematodes may not be detected by inspection of seeds. These pests may instead be detected by specific laboratory tests developed and validated for regulated pests in seeds.	Better structure of the sentence.	ISF*
753.	149	Substantive	In certain cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; for example, laboratory testing. Pests such as viruses, <u>viroids</u> , bacteria, fungi and some nematodes may not be detected by inspection of seeds. These pests may instead be detected by specific laboratory tests developed and validated for regulated pests in seeds.	to include another relevant pest type.	Singapore, China, Korea, Republic of, Ghana, Japan, Belize
754.	149	Substantive	In certain cases, inspection may not be sufficient to determine if a <u>regulated</u> pest is present and other <u>phytosanitary measure</u> <del>forms of detection</del> may be needed; for example, laboratory testing. Pests such as viruses, bacteria, fungi and some nematodes may not be detected by inspection of seeds. These pests may <del>instead</del> be detected by specific laboratory tests. <del>developed and validated for regulated pests in seeds.</del>	For compatibility with the term Testing used in the glossary	NEPPO, Bahrain, Morocco

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
755.	149	Substantive	In certain cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; for example, laboratory testing. Pests such as viruses, <u>viroids</u> , bacteria, fungi and some nematodes may not be detected by inspection of seeds. These pests may instead be detected by specific laboratory tests developed and validated for regulated pests in seeds.	The term "viroids" should be added to specify the pests other than the aforementioned pest groups which may not be detected by inspection of seeds.	Thailand
756.	149	Substantive	In certain cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; for example, laboratory testing. Pests such as <u>viroids</u> , viruses, bacteria, fungi and some nematodes may not be detected by inspection of seeds. These pests may instead be detected by specific laboratory tests developed and validated for regulated pests in seeds.	viroids missing	ISTA*
757.	149	Substantive	<del>In certain cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; for example, laboratory testing. Pests such as viruses, bacteria, fungi and some nematodes may not be detected by inspection of seeds.</del> These pests may instead be detected by specific laboratory tests developed and validated for regulated pests in seeds.	Amendment and deletion of certain texts in the sentence to provide contextual clarification.	South Africa
758.	149	Technical	In certain cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; for example, laboratory testing. <del>Pests such as</del> Some viruses, <u>viroids</u> , bacteria, fungi and some nematodes may not be detected by inspection of seeds. These pests may instead be detected by specific laboratory tests developed and validated for regulated pests in seeds.	Viroids added to the type of pests that may not be detected by inspection of seeds.	ISF*
759.	149	Technical	In <u>certain most</u> cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; for example, laboratory testing. Pests such as viruses, bacteria, fungi, <del>and some</del> nematodes <u>and some insects</u> may not be detected <u>and identified</u> by inspection of seeds. <del>For these pests inspection should be combined with</del> <u>may instead be detected by</u> specific laboratory tests <del>developed and validated that follow validated diagnostic protocols</del> for regulated pests <del>in seeds</del> .	"Certain" was replaced by "most" because the majority of seed borne pests are not detected and identified by inspection. Last sentence modified to not confusing with laboratory tests validated for other purposes (seed quality tests, etc).	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
760.	149	Technical	In certain cases, inspection may not be sufficient to determine if a pest is present and other forms of detection may be needed; for example, laboratory testing. Pests such as viruses, <u>viroids</u> , bacteria, fungi and some nematodes may not be detected by inspection of seeds. These pests may instead be detected by specific laboratory tests developed and validated for regulated pests in seeds.	Viroids is a pest group to which this also applies.	European Union
761.	150	Editorial	For detecting pests in or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, repeatability and reproducibility) of the diagnostic protocols used. <del>These criteria may be affected by, for example, low titre (the lowest concentration of an organism that can be detected in the test) of the pest in the seed or inhibition by seed components or seed microflora.</del> In order to guarantee performance of the diagnostic protocols, NPPOs are encouraged to apply protocols that have been reviewed by experts or validated.	This is background information and not needed for info in requirements.	Australia



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
762.	150	Substantive	<del>For detecting pests in or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, repeatability and reproducibility) of the diagnostic protocols used. These criteria may be affected by, for example, low titre (the lowest concentration of an organism that can be detected in the test) of the pest in the seed or inhibition by seed components or seed microflora. In order to guarantee performance of the diagnostic protocols, NPPOs are encouraged to apply protocols that have been reviewed by experts or validated.</del>	Delete paragraph as these concepts are covered under ISPM 27: Diagnostic protocols for regulated pests. This concept is not specific to international movement of seed.	Canada
763.	150	Substantive	For detecting pests in, <u>with</u> or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, repeatability and reproducibility) of the diagnostic protocols used. These criteria may be affected by, for example, low titre (the lowest concentration of an organism that can be detected in the test) of the pest in the seed or inhibition by seed components or seed microflora. In order to guarantee performance of the diagnostic protocols, NPPOs are encouraged to apply protocols that have been reviewed by experts or validated.	For sake of completion	ISTA*
764.	150	Substantive	For detecting pests in or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, repeatability and reproducibility) of the diagnostic protocols used. <del>These criteria may be affected by, for example, low titre (the lowest concentration of an organism that can be detected in the test) of the pest in the seed or inhibition by seed components or seed microflora.</del> In order to guarantee performance of the diagnostic protocols, NPPOs are encouraged to apply protocols that have been reviewed by experts or validated.  <u>The exporting NPPO should ensure that validated diagnostic protocols are used to avoid false positive or negative as treated seeds may for example influence the accuracy of diagnostic testing.</u>	Deletion and replacement of the highlighted paragraph for contextual clarification.	South Africa
765.	150	Technical	For detecting pests in or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, repeatability and reproducibility) of the diagnostic protocols used. These criteria may be affected by, for example, low <u>concentration of the pest in the seeds in comparison to the specified titre</u> <del>titre</del> (the lowest concentration of an organism that can be detected in the test) <del>of the pest in the seed</del> or inhibition <u>of the diagnostic process</u> by seed components or seed microflora. <u>To obtain adequate high</u> <del>In order to guarantee</del> performance of <del>the</del> diagnostic protocols, NPPOs are encouraged to apply <u>internationally recognized or validated</u> protocols <del>that have been reviewed by experts or validated.</del>	To clarify, use the right wording and the right principles for laboratory testing.	EPPO, Georgia, Serbia, Algeria
766.	150	Technical	For detecting pests in or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, repeatability and reproducibility) of	More flexibility	NEPPO, Bahrain,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			the diagnostic protocols used. These criteria may be affected by, for example, low titre (the lowest concentration of an organism that can be detected in the test) of the pest in the seed or inhibition by seed components or seed microflora. In order to guarantee performance of the diagnostic protocols, NPPOs are encouraged to apply protocols that have been reviewed by experts <u>and</u> or validated.		Morocco
767.	150	Technical	For detecting <u>regulated</u> pests in or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, <del>repeatability</del> and reproducibility) of the diagnostic protocols used. These criteria may be affected by, for example, low titre (the lowest concentration of an organism that can be detected in the test) of the pest in the seed or inhibition by seed components or seed microflora. In order to guarantee performance of the diagnostic protocols, NPPOs are encouraged to apply protocols that have been reviewed by experts or <u>adopted by the CPM as Annexes of ISPM 27:2006</u> <del>validated</del> .	To clarify. According ISPM 27 methods included in DPs are selected on the basis of the sensitivity, specificity and reproducibility. Second sentence is not clear and should be clarified its meaning. DPs should include also those adopted by CPM. We propose to delete the term "validated" because it is not clear "who" should do this "validation".	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
768.	150	Technical	For detecting pests in or on seeds, particular attention should be paid to the performance criteria (sensitivity, specificity, repeatability and reproducibility) of the diagnostic protocols used. <del>These criteria</del> <u>Test performance</u> may be affected by, for example, low <u>concentration of the pest in the seeds in comparison to the specified titre</u> <del>titre</del> (the lowest concentration of an organism that can be detected in the test) <del>of the pest in the seed</del> or inhibition <u>of the diagnostic process</u> by seed components or seed microflora. <del>To obtain adequate high</del> <u>In order to guarantee</u> performance of <del>the</del> diagnostic protocols, NPPOs are encouraged to apply <u>internationally recognized or validated</u> protocols <del>that have been reviewed by experts or validated</del> .	To clarify, use the right wording and the right principles for laboratory testing.	European Union
769.	151	Substantive	Further information on available validated and reviewed diagnostic protocols can be found in Appendix 1 of this standard. The general principles of diagnostic protocols are described in ISPM 27:2006.  <u>Special attention should be given to problems as following.</u>	It's logically more reasonable.	China
770.	151	Technical	<u>The principles of diagnostic protocols are described in ISPM 27:2006 and adopted protocols are provided as annexes to ISPM 27. Information on other protocols can be found in Appendix 1.</u> <del>Further information on available validated and reviewed diagnostic protocols can be found in Appendix 1 of this standard. The general principles of diagnostic protocols are described in ISPM 27:2006.</del>	The IPPC protocols should be referred to first in an IPPC standard.	EPPO, Georgia, European Union, Norway, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
771.	151	Technical	Further information on available <u>adopted/validated/ and</u> reviewed diagnostic protocols can be found in Appendix 1 of this standard. The general principles of diagnostic protocols <u>and sepecific diagnostic protocols</u> are described in ISPM 27:2006.	For the consistency with the ISPMs	NEPPO, Bahrain, Morocco
772.	151	Technical	Further information on available <del>validated and reviewed</del> diagnostic protocols can be found in Appendix 1 of this standard. <del>The general principles</del> <u>Guidance on the structure and content</u> of diagnostic protocols <del>are described</del> <u>is provided</u> in ISPM 27:2006.	Diagnostic protocols should be reviewed by experts, and official laboratories will apply a protocol according availability of techniques. Second sentence was reworded for consistency with ISPM 27	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
773.	152	Editorial	<b>4.3.1 Serological and molecular <del>diagnostic</del><u>detection</u> protocols</b>	To make wording consistent with the title of "4.3 Detection".	Japan
774.	152	Substantive	<del>4.3.1 Serological and molecular diagnostic protocols</del> <u>Delete entire paragraph</u>	The decision on testing methodology is part of PRA and needs to be established on case by case basis.	NEPPO, Bahrain, Morocco
775.	152	Substantive	<del>4.3.1 Serological and molecular diagnostic protocols</del>	Delete paragraphs [152 and 153} because they are best practices and not appropriate for an ISPM.	Canada
776.	152	Substantive	<del>4.3.1 Serological and molecular diagnostic protocols</del>	Detailing the guideline on testing of seeds in terms of diagnostic protocols is not relevant for this standard.	South Africa
777.	152	Technical	<b>4.3.1 <del>Serological and m</del>Molecular diagnostic protocols</b>	Serological methods are not adapted	New Caledonia*
778.	152	Technical	<b>4.3.1 Serological and molecular <del>diagnostic</del> <u>detection</u> protocols</b>	As the header of this chapter 4.3 is "Detection", it is consistent to use the term "detection protocols". In addition, the protocols for seed health testing are focused on detection of presence/absence of specific target pests.	ISF*
779.	152	Technical	<b>4.3.1 Serological and molecular <del>diagnostic</del><u>detection</u> protocols</b>	for more clarity	Korea, Republic of, Ghana, Belize
780.	153	Substantive	Serological and molecular diagnostic tests are considered indirect protocols. They detect specific pest components that may be present even when pests are no longer viable. Consequently, when testing seeds with these methods, results should be interpreted carefully. Because positive results can occur even when no viable pests are present, confirmatory direct tests or additional indirect tests may be required, provided the performance criteria are equivalent. <u>These diagnostic methods may be used to confirm negatives faster t han other direct methods.</u>	More informative	United States of America

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
781.	153	Substantive	<del>Serological and molecular diagnostic tests are considered indirect protocols. They detect specific pest components that may be present even when pests are no longer viable. Consequently, when testing seeds with these methods, results should be interpreted carefully. Because positive results can occur even when no viable pests are present, confirmatory direct tests or additional indirect tests may be required, provided the performance criteria are equivalent.</del>	Delete paragraphs [152 and 153} because they are best practices and not appropriate for an ISPM. Further, they are not specific to seeds.	Canada
782.	153	Substantive	Serological and molecular diagnostic tests are considered indirect protocols. They detect specific pest components that may be present even when pests are no longer viable. Consequently, when testing seeds with these methods, results should be interpreted carefully. Because positive results can occur even when no viable pests are present, confirmatory direct tests or additional indirect tests may be required, provided the performance criteria are equivalent.	Regarding: "...no longer viable." Comment: This is also the case with tests based on morphological identification without cultivation/growth of the pest, i.e for detection of nematodes, downy mildews, smuts, Tilletia...	ISTA*
783.	153	Substantive	<del>Serological and molecular diagnostic tests are considered indirect protocols. They detect specific pest components that may be present even when pests are no longer viable. Consequently, when testing seeds with these methods, results should be interpreted carefully. Because positive results can occur even when no viable pests are present, confirmatory direct tests or additional indirect tests may be required, provided the performance criteria are equivalent.</del>	Detailing the guideline on testing of seeds in terms of diagnostic protocols is not relevant for this standard.	South Africa
784.	153	Technical	<del>Serological and m</del> Molecular diagnostic tests are considered indirect protocols. They detect specific pest components that may be present even when pests are no longer viable. Consequently, when testing seeds with these methods, results should be interpreted carefully. Because positive results can occur even when no viable pests are present, confirmatory direct tests <del>may be required or additional indirect tests may be required, provided the performance criteria are equivalent.</del>	In consistency with the explanation of the paragraph 152	New Caledonia*
785.	153	Technical	Serological and molecular diagnostic tests are <u>effective at</u> <del>considered indirect protocols. They detect parts of specific pests components</del> that may be present <u>in a sample (e.g. DNA or RNA fragments in molecular tests and antigens in serological tests).</u> They may give a positive result even when <u>no viable</u> pests are <u>present</u> <del>no longer viable</del> . Consequently, when testing seeds with these methods, results should be interpreted carefully. <del>Because positive results can occur even when no viable pests are present, c</del> Confirmatory <u>direct</u> tests or additional <u>indirect</u> tests may be required <u>to confirm the presence of viable pests in a sample,</u> provided the performance criteria are equivalent.	To make the text clearer and more readable and avoid the use of the unclear words 'direct' and 'indirect'	EPPO, Georgia, European Union, Norway, Serbia, Algeria
786.	153	Technical	<del>Serological and molecular diagnostic tests are considered indirect protocols. They detect specific pest components that may be present even when pests are no longer viable. Consequently, when testing seeds with these methods, results should be interpreted carefully. Because positive results can occur even when no viable pests are present, confirmatory direct tests or additional indirect tests may</del>	1. (first para added) Since the use of the terms 'direct test protocols' and 'indirect protocols' may raise questions, these terms have been removed. 2. (second para added) The objective of this section is prevention of false positives due to inclusion of non-viable organisms in the test scoring.	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><del>be required, provided the performance criteria are equivalent.</del></p> <p><u>Serological and molecular tests detect proteins or nucleic acids specific to the target pest that may be present even when the pest is no longer viable, thereby giving a false positive result. Consequently, when using these methods a positive result should be confirmed by testing seed from the same seed lot using a method that determines the viability of the target pest.</u></p> <p><u>If a method that determines the viability of the target pest is not available, a second test based on different biological principles should be used to confirm the result obtained.</u></p>		
787.	153	Technical	<p>Serological and molecular diagnostic tests are considered indirect protocols. They detect specific pest components that may be present even when <u>some of</u> pests are no longer viable. Consequently, when testing seeds with these methods, results should be interpreted carefully. Because positive results can occur even when no viable pests are present, confirmatory direct tests or additional indirect tests may be required, provided the performance criteria are equivalent. <u>In practice, non-viability of whole pest population in seeds are not easy to detect.</u></p>	provide more brevity and clarity	Korea, Republic of, Ghana, Belize
788.	153	Technical	<p><u>NPPO's are encouraged to use molecular and serological diagnostic methods to detect pathogens in seeds and in seed production crops because these methods are generally more accurate, sensitive and specific than other methods, including inspection.</u> Serological and molecular diagnostic tests <del>are considered indirect protocols. They</del> detect specific pest components that may be present even when pests are no longer viable <u>after a treatment has been applied</u>. Consequently, when testing seeds with these methods, <del>results should be interpreted carefully. Because</del> positive results can occur even when no viable pests are present, confirmatory <del>direct tests or additional indirect tests</del> may be required, provided the performance criteria are equivalent.</p>	Suggested addition to make it clear the benefits of these testing methods. It is not clear what direct and indirect tests are. Simplify and delete terms. Add clarification that pests would no longer be viable due to application of a treatment.	Australia
789.	154	Substantive	<p><del>4.3.2 Treated seeds</del></p> <p><u>To remove whole section (paragraphs 154-160)</u></p>	Information of details of detection methods should not be part of the body of this ISPM	NEPPO, Bahrain, Morocco
790.	154	Substantive	<del>4.3.2 Treated seeds</del>	Detailing the guideline on seed treatment or treated seeds is not relevant for this standard.	South Africa
791.	155	Substantive	<p><del>Ideally, treatment efficacy for inactivating a pest is determined using a detection method that detects only viable pests so that a negative test result indicates the treatment has been successful. Examples of such detection methods are techniques for the detection of fungi where the mycelium will grow on the substrate (i.e. media or blotters), and techniques for the detection of bacteria and</del></p>	Detailing the guideline on seed treatment or treated seeds is not relevant for this standard.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>fungi where the seeds are sown and symptoms observed on plantlets (i.e. grow-out).</del>		
792.	155	Technical	Ideally, treatment efficacy for inactivating a pest <del>should be is</del> determined using a detection method that detects only viable pests so that a negative test result indicates the treatment has been successful. Examples <del>of such detection methods</del> are techniques for the detection of fungi where the mycelium will grow on the substrate (i.e. media or blotters), and techniques for the detection of bacteria and fungi where the seeds are sown and symptoms observed on <del>emerging plantlets (i.e. grow-out).</del>	Simplification and use of correct terms	EPPO, Georgia, European Union, Serbia
793.	156	Substantive	Test results of treated seeds should be interpreted carefully because <del>seed</del> treatments may interact with diagnostic tests in several ways:	Add "seed" before treatments for clarity.	Canada
794.	156	Substantive	<del>Test results of treated seeds should be interpreted carefully because treatments may interact with diagnostic tests in several ways:</del>	Detailing the guideline on seed treatment or treated seeds is not relevant for this standard.	South Africa
795.	157	Substantive	- The treatment inactivates the pest but the detection method detects the viable and non-viable pests, which happens with some indirect tests <del>such as serological or molecular</del> or tests in which detection is based on morphological identification of pests or pest structures that may remain even after treatment (e.g. nematodes, spores). In such cases, determination of the efficacy of the treatment may be inconclusive.	For sake of clarity	ISTA*
796.	157	Substantive	<del>- The treatment inactivates the pest but the detection method detects the viable and non-viable pests, which happens with some indirect tests or tests in which detection is based on morphological identification of pests or pest structures that may remain even after treatment (e.g. nematodes, spores). In such cases, determination of the efficacy of the treatment may be inconclusive.</del>	Detailing the guideline on seed treatment or treated seeds is not relevant for this standard.	South Africa
797.	157	Technical	- The treatment inactivates the pest but the detection method detects <del>both the</del> viable and non-viable pests. <del>This may be the case, which happens</del> with some <del>serological or molecular indirect</del> tests or <del>tests in which when</del> detection is based on morphological identification of pests or pest structures that may remain even after treatment (e.g. nematodes, spores). In such cases, determination of the efficacy of the treatment may be inconclusive.	Clearer text and avoiding the use of 'direct' and 'indirect' tests.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
798.	157	Technical	- The treatment inactivates the pest but the detection method detects the viable and non-viable pests, which happens with <del>some indirect</del> <del>serological or molecular</del> tests or tests in which detection is based on morphological identification of pests or pest structures that may remain even after treatment (e.g. nematodes, spores). In such cases, determination of the efficacy of the treatment may be inconclusive.	Consistency with text introduced in [153].	ISF*
799.	157	Technical	- The treatment inactivates the pest but the detection method detects <del>the viable and</del> non-viable pests, which happens with some <del>indirect</del> <del>serological and molecular</del> tests or tests in which detection is based on	Only relevant that non-viable pests can be detected. Replace indirect with serological and molecular test for consistency.	Australia



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			morphological identification of pests or pest structures that may remain even after treatment (e.g. nematodes, spores). In such cases, determination of the efficacy of the treatment may be inconclusive.		
800.	158	Editorial	- The treatment adversely affects the detection method; for example, a method detects only pests present externally but the pest remains present internally after treatment and is not detected. In these situations, other detection methods <u>that are</u> able to detect internal infection should be used (e.g. <i>Xanthomonas campestris</i> pv. <i>campestris</i> after disinfection is not detected after seeds are soaked but may still be detected after seeds are ground).	Editorial correction	ISF*
801.	158	Substantive	- <u>The treatment may physically or chemically inhibit the detection method (e.g. some detection methods for bacteria are affected by fungicide treatments).</u>  - The treatment adversely affects the detection method; for example, a method detects only pests present externally but the pest remains present internally after treatment and is not detected. In these situations, other detection methods able to detect internal infection should be used (e.g. <i>Xanthomonas campestris</i> pv. <i>campestris</i> after disinfection is not detected after seeds are soaked but may still be detected after seeds are ground).	This is a clearer and more relevant situation that should be mentioned before 158 (moved from 159)	EPPO, Georgia, European Union, Norway, Serbia, Algeria
802.	158	Substantive	- The treatment adversely affects the detection method; for example, a method detects only pests present externally but the pest remains present internally after treatment and is not detected. In these situations, other detection methods able to detect internal infection should be used (e.g. <i>Xanthomonas campestris</i> pv. <i>campestris</i> after disinfection is not detected after <u>the surface of the</u> seeds are <u>disinfected</u> <del>soaked</del> but may still be detected after seeds are ground <u>to expose the internal parts of the seed</u> ).	Adding text to provide clarity in the given example.	Canada
803.	158	Substantive	<del>- The treatment adversely affects the detection method; for example, a method detects only pests present externally but the pest remains present internally after treatment and is not detected. In these situations, other detection methods able to detect internal infection should be used (e.g. <i>Xanthomonas campestris</i> pv. <i>campestris</i> after disinfection is not detected after seeds are soaked but may still be detected after seeds are ground).</del>	Detailing the guideline on seed treatment or treated seeds is not relevant for this standard.	South Africa
804.	158	Technical	- The <u>detection method should take into account any</u> treatment <u>that</u> adversely affects the detection method; for example, a method detects only pests present externally but <u>any</u> <del>the</del> pest remains <u>ing</u> present internally after treatment <u>can</u> <del>and is</del> not <u>be</u> detected. In these situations, other detection methods able to detect internal infection should be used (e.g. <i>Xanthomonas campestris</i> pv. <i>campestris</i> after disinfection <u>of the seeds can</u> <del>is</del> not <u>be</u> detected after seeds <u>have been</u> <del>are</del> soaked but may <del>still</del> be detected after seeds <u>have been</u> <del>are</del> ground).	Clarity in wording	EPPO, Georgia, European Union, Norway, Serbia, Algeria



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
805.	158	Technical	- The treatment adversely affects the detection method; for example, a method detects only pests present externally but the pest remains present internally after treatment and is not detected. In these situations, other detection methods able to detect internal infection should be used (e.g. <i>Xanthomonas campestris</i> pv. <i>campestris</i> after disinfection is not detected after seeds are soaked washed but may still be detected after seeds are ground).	For seed disinfected for Xcc a seed wash is insufficient to extract any remaining bacteria while an extended soak may work just as well as grinding seed to release bacteria.	ISF*
806.	159	Substantive	<del>- The treatment may physically or chemically inhibit the detection method (e.g. some detection methods for bacteria are affected by fungicide treatments).</del>	Detailing the guideline on seed treatment or treated seeds is not relevant for this standard.	South Africa
807.	159	Technical	<del>-The treatment may physically or chemically inhibit the detection method (e.g. some detection methods for bacteria are affected by fungicide treatments).</del>	Moved to paragraph 158 for consistency and having the most important situation first.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
808.	160	Editorial	- The treatment causes false positive, false negative or unreadable results (in serological or molecular detection methods). For false negative and unreadable results, detection methods should be applied to an untreated sample (where the treatment is not aimed at suppressing or inactivating the target pest), or spiked positive controls (i.e. a pure culture with the target pest added to the seed extract) should be tested by the detection method.	Parentheses removed to clarify the sentence.	ISF*
809.	160	Substantive	- The treatment causes false positive, false negative or unreadable results (in serological or molecular detection methods). For false negative and unreadable results, <u>a preliminary testing should be conducted to verify the</u> detection methods <del>should be applied to</del> <u>by using</u> an untreated sample (where the treatment is not aimed at suppressing or inactivating the target pest), or spiked positive controls (i.e. a pure culture with the target pest added to the seed extract) should be tested by the detection method.	To make the detection procedure intelligible.	Japan
810.	160	Substantive	<del>- The treatment causes false positive, false negative or unreadable results (in serological or molecular detection methods). For false negative and unreadable results, detection methods should be applied to an untreated sample (where the treatment is not aimed at suppressing or inactivating the target pest), or spiked positive controls (i.e. a pure culture with the target pest added to the seed extract) should be tested by the detection method.</del>	Detailing the guideline on seed treatment or treated seeds is not relevant for this standard.	South Africa
811.	160	Technical	<del>-The treatment causes false positive, false negative or unreadable results (in serological or molecular detection methods).</del> For false negative and unreadable results, detection methods should be applied to an untreated sample <u>from the same seeds</u> (where <del>no</del> the treatment is <u>is applied to</u> <del>not aimed at</del> suppressing or inactivat <u>ing</u> the target pest), or spiked positive controls (i.e. a pure culture with the target pest added to the seed extract) should be tested <u>using</u> <del>by</del> the <u>same</u> detection method.	More clearly stating what is meant	EPPO, Georgia, European Union, Norway, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
812.	<a href="#">160</a>	Technical	- The treatment causes false positive, false negative or unreadable results (in serological or molecular detection methods). For false negative and unreadable results, detection methods should be applied to an untreated sample (where the treatment is not aimed at suppressing or inactivating the target pest), or <del>spiked</del> positive controls (i.e. a pure culture with the target pest added to the seed extract) should be tested by the detection method.	Unecessary. Spiked is part of a positive control.	Australia
813.	<a href="#">161</a>	Substantive	<del>4.4 Importation of small seed lots</del>  <u>To remove entire section (para 161-162)</u>	To be in consistency with other comments on this draft ISPM about the intended use and the amount of the imported lots without differentiation between the quantity	NEPPO, Bahrain, Morocco
814.	<a href="#">161</a>	Substantive	<del>4.4 Importation of small seed lots</del>	Deletion of this paragraphs, the reason being that this information has already been explained under intended use of point 1.2.	South Africa
815.	<a href="#">161</a>	Substantive	<del>4.4 Importation of small seed lots</del>	Phytosanitary requirements are established for commodity, not for quantity.	OIRSA
816.	<a href="#">161</a>	Substantive	<del>4.4 Importation of small seed lots</del>	As with paragraph [34] There is no quarantine basis for suggesting NPPO's may establish specific requirements for the importation of small seed lots. The inclusion of this suggestion in the outline of requirements potentially misleads NPPO's that small seed lots represent a differing risk from large consignments but both can be high risk sources.	Australia
817.	<a href="#">161</a>	Technical	<del>4.4 Importation of small seed lots</del>	Deletion in consistence with small seed lots	New Caledonia*
818.	<a href="#">161</a>	Technical	<del>4.4 Importation of small seed lots</del> <u>consignments</u>	"lot" was replaced for "consignment" as per comment in para. 129	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
819.	<a href="#">162</a>	Editorial	The NPPO of the importing country may establish specific procedures for the import <del>ation</del> of small seed lots (e.g. individual packets of seed) taking into account the intended use, size of the lot, production history and origin of the seeds.	Better word.	European Union
820.	<a href="#">162</a>	Substantive	The NPPO of the importing country may establish <del>separate</del> <u>specific</u> procedures for the importation of small <del>seed</del> lots <u>of seeds</u> (e.g. individual packets of seeds <u>for the final, non-commercial user</u> ) taking into account the intended use, size of the lot, production history and origin of the seeds.	To clarify and specify the meaning	EPPO, Georgia, European Union, Norway, Serbia, Algeria

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
821.	162	Substantive	<del>The NPPO of the importing country may establish specific procedures for the importation of small seed lots (e.g. individual packets of seed) taking into account the intended use, size of the lot, production history and origin of the seeds.</del>	Deletion of this paragraph, the reason being that this information has already been explained under intended use of point 1.2.	South Africa
822.	162	Substantive	<del>The NPPO of the importing country may establish specific procedures for the importation of small seed lots (e.g. individual packets of seed) taking into account the intended use, size of the lot, production history and origin of the seeds.</del>	Phytosanitary requirements are established for commodity, not for quantity.	OIRSA
823.	162	Substantive	<del>The NPPO of the importing country may establish specific procedures for the importation of small seed lots (e.g. individual packets of seed) taking into account the intended use, size of the lot, production history and origin of the seeds.</del>	As with paragraph [34] There is no quarantine basis for suggesting NPPO's may establish specific requirements for the importation of small seed lots. The inclusion of this suggestion in the outline of requirements potentially misleads NPPO's that small seed lots represent a differing risk from large consignments but both can be high risk sources.	Australia
824.	162	Technical	<del>The NPPO of the importing country may establish specific procedures for the importation of small seed lots (e.g. individual packets of seed) taking into account the intended use, size of the lot, production history and origin of the seeds.</del>	Deletion in consistent with small seeds lots.	New Caledonia*
825.	162	Technical	The NPPO of the importing country may establish specific procedures for the importation of small seed lots (e.g. individual packets of seed) taking into account the intended use, size of the lot, production history and origin of the seeds. <u>In certain cases specific import authorizations e.g. in the form of a licence or permit, as described in ISPM 20:2004, could be applied.</u>	There are instances where the quantity of seed in the lot is too small to allow the usual phytosanitary measures required for seed of a given species. In such cases, in addition to alternative sampling strategies as described above in 4.2.1., the instrument of an import permit detailing adapted and feasible requirements may be used (see: ISPM 20:2004, 4.2.1 and 4.2.2.)	ISF*
826.	162	Technical	The NPPO of the importing country may establish specific procedures for the importation of small seed <del>lots</del> <u>consignments</u> (e.g. individual packets of seed) taking into account <u>the purpose for which they are imported</u> <del>the intended use</del> , size of the <del>lot</del> <u>consignment</u> , production history and origin of the seeds <u>and the assessed pest risk</u> . <u>General and specific import authorizations are described in ISPM 20:2004.</u>	lot" was replaced for "consignment" as per comment in para. 129. "pest risk" added as is the main criteria to consider. Reference to ISPM 20 added because provides guidance on import permits.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
827.	163	Substantive	<b>5. <u>Phytosanitary Certification</u> <u>Re-export of seeds</u></b>	Section 5 does not refer to the entire process of phytosanitary certification, e.g. field inspection, laboratory testing, pest free areas, it refers only to phytosanitary certificates and re-export of seeds already harmonized in ISPM 12	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
828.	164	Substantive	<del>5.1 General considerations</del>	This topic should be under para.165.	Thailand
829.	164	Substantive	<b>5.1 General considerations</b>	Section 5.1 refers to phytosanitary certificates, particularly re-export of seeds, already harmonized in ISPM 12	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
830.	164	Substantive	<del>5.1 General considerations</del>	The problem statement is well defined; however it does not provide guidance for solutions.	South Africa
831.	164	Technical	<del>5.1 General considerations</del>	This subheading is not needed when the numbering of the following paragraphs is adjusted. Then the headings better cover the contents of the paragraphs.	EPPO, Georgia, European Union, Norway, Serbia
832.	165	Editorial	The global and temporal nature of the seed trade (i.e. long-term storage, re-export to many destinations) presents phytosanitary certification challenges distinct from those of the international movement of other <del>more</del> perishable commodities.	The word 'more' is redundant	ISF*
833.	165	Substantive	The global and temporal nature of the seed trade (i.e. long-term storage, re-export to many destinations) presents phytosanitary certification challenges distinct from those of the international movement of other more perishable commodities.  <u>NPPOs are encouraged to require the standard wording for additional declarations as specified in Appendix 2 of ISPM 12:2011.</u>	For seeds the standard wording of the additional declarations as specified in ISPM 12 is even more important due to the frequent re-exports to many countries. Therefore it is essential to mention this in this standard.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
834.	165	Substantive	The global and temporal nature of the seed trade ( <del>e.g. i.e.</del> long-term storage, re-export to many destinations, <u>blending and mixing of multiple seed lots</u> ) presents phytosanitary certification challenges distinct from those of the international movement of other more perishable commodities.	1. Delete "i.e." and add "e.g." as this is not an exclusive list. 2. Add "blending and mixing of multiple seed lots" as this is another challenge for phytosanitary certification.	Canada
835.	165	Substantive	The global and temporal nature of the seed trade (i.e. long-term storage, re-export to many destinations) presents phytosanitary certification challenges distinct from those of the international movement of other <del>more</del> perishable commodities.	Deletion of "more" for contextual clarification.	South Africa
836.	165	Technical	The global and temporal nature of the seed trade (i.e. <del>repeated long-term storage</del> , re-export <u>from parts of the same seed lot</u> to many destinations <u>and long-term storage</u> ) presents phytosanitary certification challenges distinct from those of the international movement of other <u>plants for planting</u> <del>more perishable commodities</del> .	Consistent wording with other parts of the standard, which is also clearer.	EPPO, Georgia, European Union, Norway, Serbia
837.	165	Technical	The global and temporal nature of the seed trade (i.e. long-term storage, re-export to many destinations) presents phytosanitary certification challenges	Deleted because it is not necessary to clarify.	COSAVE, Brazil, Uruguay, Chile,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			distinct from those of the international movement of other <del>more-perishable</del> commodities.		Peru, Argentina
838.	166	Editorial	<u>5.1 General consideration for re-export</u>  Additional official phytosanitary information, which is not required by the first country of import, attesting to freedom from pests may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. This information should be separated from the additional declaration required by the first country of import, in accordance with ISPM 12:2011.	This topic should focus on PC for re-export.	Thailand
839.	166	Editorial	Additional official phytosanitary information, which is not required by the first country of import, attesting to freedom from pests may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. This information should be separated from the additional declaration(s) required by the first country of import, in accordance with ISPM 12:2011.	More than one AD may be required.	ISF*
840.	166	Substantive	Additional official phytosanitary information, which is not required by the first country of import, attesting to freedom from pests may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. This information should be separated from the additional declaration required by the first country of import, in accordance with ISPM 12:2011.  <u>NPPOs are encouraged to provide other additional phytosanitary information, when requested by the exporter.</u>	For seeds the use of additional official information as specified in ISPM 12 is even more important due to the frequent re-exports to many countries. Therefore it is essential to mention this in this standard.	EPPO, Georgia, European Union, Serbia, Algeria
841.	166	Substantive	Additional official phytosanitary information, which is not required by the first country of import, <del>attesting to freedom from pests</del> may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. <del>This information should be separated from the additional declaration required by the first country of import, in accordance with (</del> ISPM 12:2011).	No need to include provisions of ISPM 12. Moreover, NPPOs should refer to ISPM 12 for guidance on how to complete a PC	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
842.	166	Substantive	Additional official phytosanitary information, which is not required by the first country of import, attesting to freedom from pests may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. <u>NPPOs are encouraged to provide such additional phytosanitary information when requested by the exporter.</u> This information should be separated from the additional declaration required by the first country of import, in accordance with ISPM 12:2011.	For seeds the use of additional official information on phytosanitary certificates, as specified in ISPM 12, is even more important due to the frequent re-exports to many countries. Therefore it is essential to mention this in this standard.	Norway

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
843.	166	Substantive	Additional official phytosanitary information, which is not required by the first country of import, attesting to freedom from pests may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. This information should be separated from the additional declaration required by the first country of import <u>under "additional official phytosanitary information" as specified, in the Phytosanitary certificate accordance with ISPM 12:2011.</u>	For better specification	OIRSA
844.	166	Technical	<del>Additional official phytosanitary information, which is not required by the first country of import, attesting to freedom from pests may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. This information should be separated from the additional declaration required by the first country of import, in accordance with ISPM 12:2011.</del>  <u>Additional official phytosanitary information can be circulated between importing and exporting NPPOs under specific bilateral agreement to facilitate the process of reexports of seeds. This information should not be circulated under the phytosanitary certificate</u>	It should be a matter of a bi-lateral agreement	New Caledonia*
845.	166	Technical	Additional official phytosanitary information, which is not required by the first country of import, <del>attesting to freedom from pests</del> may be included on the phytosanitary certificate <u>issued by the country of origin</u> when <u>so</u> requested by the exporter to facilitate future re-export to other countries. This information should be separated from the additional declaration required by the first country of import, in accordance with ISPM 12:2011.	To make the sentence clearer and more readable.	EPPO, Georgia, European Union, Norway, Serbia, Algeria
846.	166	Technical	Additional official phytosanitary information, which is not required by the first country of import, attesting to freedom from pests may be included on the phytosanitary certificate when requested by the exporter to facilitate future re-export to other countries. This information should be separated from the additional declaration required by the first country of import, in accordance with ISPM 12:2011.  <u>For re-exports of seed, NPPOs should recognize the information provided in the additional declaration section as well as in the form of 'Additional Official Phytosanitary Information' (AOPI) (ISPM 12) and not require additional testing or inspection for pests covered in the AOPI except if documentation is absent or the requirements of the importing country are more stringent or the phytosanitary status of the consignment has changed.</u>  <u>Minor variations in the wording of additional declarations may create obstacles to</u>	1. (first para added) NPPOs of re-exporting countries have the obligation to verify that import requirements are met but in many instances this may simply mean reviewing provided documentation or acknowledging demonstrated pest-free status. In rare cases when such documentation is absent, where the requirements of the importing country are more stringent than the available ADs/AOPI would cover or in case the phytosanitary status of the consignment is deemed to have changed over time, will additional measures be necessary. There are essentially 3 scenarios for seeds: i. The information available of the Phytosanitary Certificate of the country of seed production is deemed to be sufficient to meet the	ISF*



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><u>the international movement of seeds that are re-exported to multiple destinations. NPPOs are encouraged to use the standard wording provided in ISPM 12:2011.</u></p> <p><u>In cases where phytosanitary import requirements allow for several alternative measures, the NPPO should always include the actual text of the additional declarations required in addition to a reference to the applicable article in the phytosanitary legislation of the importing country.</u></p>	<p>requirement of the importing country. This concerns information available as a regular Additional Declaration, already required at import into the re-exporting country, as well as 'Additional Official Phytosanitary Information' that was added to the PC by the NPPO of the country of seed production. In this Scenario the NPPO of the re-exporting country issues a Re-Export Certificate (without Additional Declarations) and adds a certified copy of the incoming original PC. ii. The information available on the Phytosanitary Certificate of the country of seed production is deemed to be incomplete or insufficient to meet the more stringent requirements of the importing country. In case the missing/insufficient information can be collected from inspections/tests done in the re-exporting country, this can be added in the form of ADs on the Re-Export Certificate. In this scenario the NPPO of the re-exporting country issues a Re-Export Certificate (with Additional Declarations) and adds a certified copy of the incoming original PC. iii. The information available on the Phytosanitary Certificate of the country of seed production is deemed to be incomplete or insufficient to meet the more stringent requirements of the importing country and the information cannot be collected from inspections/tests done in the Re-exporting country. In this case the NPPO of the re-exporting country may try to obtain additional assurance from the NPPO of the country where the seeds were produced. If this is not the case no Export/Re-Export Certificate can be issued. 2. (second para added) Since seeds produced in a country may be exported and re-exported to many countries the use of recommended wording for additional declarations in Appendix 2 of ISPM 12:2011 is essential. This needs to be re-emphasized in this ISPM for seeds. 3. (third para added) NPPOs must not require citing just the</p>	



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				specifics of their phytosanitary regulations (e.g. article number) in the additional declarations. If citing a specific article of the phytosanitary or other regulation is required, the actual text of the additional declaration should be required as well.	
847.	167	Editorial	<del>The importing country's</del> <del>in some cases, the</del> phytosanitary import requirement for a field inspection <del>may</del> is not <del>always be</del> known at the time of production. <del>The</del> NPPOs of the exporting country should consider additional field inspections on the request of the producer to allow <del>for</del> future re-export. <del>The</del> NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil <del>the purpose of its</del> phytosanitary import requirements <del>for when seeds is</del> already harvested.	For consistency and clarity	EPPO, Georgia, European Union, Serbia
848.	167	Substantive	In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. <del>NPPOs of the exporting country may consider additional field inspections on the request of the exporter to allow future re-export. NPPOs of the exporting country should consider additional field inspections on the request of the producer to allow future re-export. The system for this assistance may be difficult to be arranged; it may be possible to use bilateral arrangements between NPPOs to facilitate the provision of this information.</del> NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary import requirements when seed is already harvested.	To acknowledge the difficulty in this arrangement and the possibility of bilateral arrangements as an alternative.	Singapore, China
849.	167	Substantive	<del>In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. NPPOs of the exporting country should consider additional field inspections on the request of the producer to allow future re-export. NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary import requirements when seed is already harvested.</del>	Confusing and contradictory with the ISPM 12	NEPPO, Bahrain, Morocco
850.	167	Substantive	In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. <del>NPPOs of the exporting country should consider additional field inspections on the request of the producer to allow future re-export.</del> NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary import requirements when seed is already harvested.	Delete second sentence as this would be at the discretion of the NPPO. Do not believe suggestions for use of NPPO resources should be contained in an ISPM unless a requirement.	Canada
851.	167	Substantive	In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. NPPOs of the exporting country <del>on request by exporters, may provide</del> <del>should consider</del> additional phytosanitary information (e.g. the results of field inspections) <del>on the request of the producer</del> to allow future re-export. <del>NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary</del>	Text modified to be consistent with ISPM 12. The NPPO of the exporting country may provide this information on request by exporters not on the request by the producer. Last sentence deleted because there is an entire section on equivalence of phytosanitary measures, so there is no need to	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>import requirements when seed is already harvested.</del>	repeat here. In addition see comments on paragraph 126	
852.	167	Substantive	<del>In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. NPPOs of the exporting country should consider additional field inspections on the request of the producer to allow future re-export. NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary import requirements when seed is already harvested.</del>	deletion whole para because of redundancy	Korea, Republic of, Ghana, Belize
853.	167	Substantive	Dans certains cas, on ne sait pas au moment de la production que l'inspection au champ fera partie des exigences phytosanitaires à l'importation. Les ONPV du pays exportateur devraient <u>s'appuyer soit sur l'historique de la semence et sur la certification pour</u> envisager la réalisation d'inspections au champ supplémentaires si le producteur en fait la demande, en vue de faciliter les futures réexportations. Les ONPV du pays importateur devraient considérer les mesures phytosanitaires équivalentes comme des options permettant de satisfaire aux exigences phytosanitaires à l'importation quand les semences sont déjà récoltées.	Assurer la traçabilité	Burundi
854.	167	Substantive	In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. NPPOs of the exporting country <del>may</del> <u>should</u> consider additional field inspections on the request of the <del>exporter</del> <u>producer</u> to allow future re-export. NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary import requirements when seed is already harvested. <u>It may be possible to use bilateral arrangements between NPPOs to facilitate the provision of this information.</u>	Understanding that this is a particular issue in the movement of seed, it is important to make it clear that this only an option importing countries MAY consider, which will be affected by their resources and ability to cost recover such activities. This is most appropriately negotiated bilaterally between NPPOs.	Australia
855.	167	Technical	<del>In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. NPPOs of the exporting country should consider additional field inspections on the request of the producer to allow future re-export. NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary import requirements when seed is already harvested.</del>	It should be a matter of a bi-lateral agreement	New Caledonia*
856.	167	Technical	In some cases, the phytosanitary import requirement for a field inspection is not known at the time of production. NPPOs of the exporting country should consider additional field inspections on the request of the producer to allow future re-export. NPPOs of the importing country should consider equivalent phytosanitary measures as options to fulfil phytosanitary import requirements when seed is already harvested. <u>(In accordance with ISPM 24 -2005)</u>	This is to make it consistent with references made to other ISPMs in the document.	Jamaica, Saint Kitts And Nevis, Dominica, Barbados, Trinidad and Tobago, Antigua and Barbuda, Belize

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
857.	168	Editorial	<del>"Place of origin" refers to the place(s) where the seeds were grown. If seeds are stored or moved, the pest risk may change over a period of time as a result of their new location. In such cases, the new location should be added to the place of origin in addition to the country of production, in accordance with ISPM 12:2011. If different lots within a consignment originate from different countries, all countries should be indicated.</del>	Clarification required	Australia
858.	168	Substantive	<del>"Origin" refers to the place(s) where the seeds were grown. If seeds are stored or moved, the pest risk may change over a period of time as a result of their new location. In such cases, the new location should be added to the place of origin in addition to the country of production, in accordance with ISPM 12:2011. If different lots within a consignment originate from different countries, all countries should be indicated.</del>	Delete this paragraph as it is covered in more details in ISPM 12: Phytosanitary Certificates, therefore redundant and is not specific to seed.	Canada
859.	168	Substantive	Le terme «origine» désigne le(s) lieu(x) où les semences ont été produites. Si les semences sont stockées ou déplacées, le risque phytosanitaire peut évoluer dans le temps du fait de leur nouvelle localisation. Dans ces circonstances, la nouvelle localisation devrait être ajoutée au lieu d'origine en plus du pays de production, conformément aux dispositions de la NIMP 12:2011. Si un envoi est composé de lots provenant de différents pays d'origine, tous ces pays devraient être indiqués <u>et les documents de certification à l'origine et l'historique de la semence accompagnent l'envoi</u> .	Assurer la traçabilité	Burundi
860.	168	Technical	<del>"Origin" refers to the place(s) where the seeds were grown. If seeds are stored or moved, the pest risk may change over a period of time as a result of their new location. In such cases, the new location should be added to the place of origin in addition to the country of production, in accordance with ISPM 12:2011. If different lots within a consignment originate from different countries, all countries should be indicated.</del>	It should be a matter of bilateral agreement	New Caledonia*
861.	168	Technical	<u>On phytosanitary certificates</u> "Origin" refers to the place(s) where the seeds were grown. If seeds are stored or moved, the pest risk may change <del>over a period of time</del> as a result of their new location <u>through the possible infestation or contamination by regulated pests</u> . In such cases, the new location should be added to the place of origin in addition to the country of production, in accordance with ISPM 12:2011. If different lots within a consignment originate from different countries, all countries should be indicated.	To specify that is for certificates and that it refers to infestation or contamination.	EPPO, Georgia, Serbia, Algeria
862.	168	Technical	"Origin" refers to the place(s) where the seeds were grown. If seeds are stored or moved, the pest risk may change over a period of time as a result of their new location. In such cases, the new location should be added to the place of origin in addition to the country of production, in accordance with ISPM 12:2011. If different lots within a consignment originate from different countries, all countries	Some NPPOs set different phytosanitary requirements not only by country of origin but also by country of distribution or country of re-export. This should only be done if there is a change in the phytosanitary status of the seeds during storage or handling in the country of distribution or re-export.	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			should be indicated.  <u>Only if the phytosanitary status of seeds has changed in its new location should this location (name of the country) be added to the description of the consignment.</u>		
863.	168	Technical	"Place of Origin" in the phytosanitary certificate refers to the place(s) where the seeds were grown. If seeds are <u>repacked</u> , stored or moved, the pest risk may change over a period of time as a result of their new location. In such cases, <u>each country and place, where necessary</u> , <del>the new location</del> should be added to the <u>initial</u> place of origin in <del>addition brackets to the country of production</del> , in accordance with ISPM 12:2011. If different lots within a consignment originate from different countries, all countries should be indicated.	This paragraph does not provide additional information to that given in ISPM 12, and could be deleted, but if it is maintained, it should be consistent with ISPM 12	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
864.	168	Technical	<u>On phytosanitary certificates</u> "Origin" refers to the place(s) where the seeds were grown. If seeds are stored or moved, the pest risk may change <del>over a period of time</del> as a result of their new location <u>through the possible infestation or contamination by regulated pests</u> . In such cases, the new location should be added to the place of origin in addition to the country of production, in accordance with ISPM 12:2011. If different lots within a consignment originate from different countries, all countries should be indicated.	To specify that is for phytosanitary certificates and that it refers to infestation or contamination.	European Union
865.	169	Editorial	<del>6.5-2</del> <b>Mixing and blending of seeds</b>	To align paragraph numbering, this is clearly a separate issue than paragraph 5	EPPO, Georgia, European Union, Serbia
866.	169	Substantive	<b>5.2 Mixing and blending of seeds</b>	This section should be further developed by the EWG, because it is a description rather than guidance. It does not add elements for assessing pest risk of mixing and blending of seeds. NPPOs need such guidance to conduct PRA. We also suggest to include the entire section as a sub-section of section 1 "Pest Risk Analysis", once further developed. Therefore we are not proposing changes in this section at this stage.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
867.	169	Substantive	<del>5.2</del> <b>Mixing and blending of seeds</b>	The problem statement is well defined; however it does not provide guidance for solutions as compared to ISPM 12.	South Africa
868.	170	Editorial	<u>Seeds from the same country of origin may be mixed and blended, as may seeds from various origins.</u> Mixing and blending of seeds may occur for various reasons.	Move paragraph 173 to this paragraph as a logical starting sentence.	EPPO, Georgia, European Union,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Serbia
869.	<a href="#">170</a>	Substantive	<del>Mixing and blending of seeds may occur for various reasons.</del>	No need for separate para for this	NEPPO, Bahrain, Morocco
870.	<a href="#">170</a>	Substantive	Mixing and blending of seeds may occur for various reasons.	See comment in Para 169.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
871.	<a href="#">171</a>	Editorial	- Mixing of seeds combines different species, varieties or cultivars of seeds into a single lot <del>(e.g. grasses, ornamentals).</del>	Unnecessary example	EPPO, Georgia, European Union, Serbia
872.	<a href="#">171</a>	Editorial	- Mixing of seeds combines different species, varieties or cultivars of seeds into a single lot (e.g. <u>lawn grass mixtures, wildflower mixtures</u> <del>grasses, ornamentals</del> ).	Replace "grasses, ornamentals" with "lawn grass mixtures, wildflower mixtures" as it is more specific and for clarity.	Canada
873.	<a href="#">171</a>	Substantive	<del>- Mixing of seeds combines different species, varieties or cultivars of seeds into a single lot (e.g. grasses, ornamentals).</del>  <u>The para (171-174) to be removed</u>	The seed certification is elaborated in the ISPM 12 mentioned in the following para 175	NEPPO, Bahrain, Morocco
874.	<a href="#">171</a>	Substantive	- Mixing of seeds combines different species, varieties or cultivars of seeds into a single lot (e.g. grasses, ornamentals).	See comment in Para 169.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
875.	<a href="#">171</a>	Technical	- Mixing of seeds combines different species, varieties or cultivars <del>of seeds</del> into a single lot (e.g. grasses, ornamentals).	In a mix one finds seeds from different species, or different varieties or cultivars.	ISF*
876.	<a href="#">172</a>	Substantive	<del>- Blending of seeds combines different seed lots of the same variety.</del>	No need for such para	NEPPO, Bahrain, Morocco
877.	<a href="#">172</a>	Substantive	- Blending of seeds combines different seed lots of the same variety.	See comment in Para 169.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
878.	<a href="#">173</a>	Editorial	<del>Seeds from the same country of origin may be mixed and blended, as may seeds from various origins.</del>	This paragraph is moved to 170 as a logical starting sentence.	EPPO, Georgia, European Union,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Serbia
879.	173	Editorial	Seeds from the same country of origin may be mixed and blended, as <u>well as may</u> seeds from various origins.	Better sentence construction.	ISF*
880.	173	Substantive	<del>Seeds from the same country of origin may be mixed and blended, as may seeds from various origins.</del>	No need such para (the seed certification is elaborated in the ISPM 12 mentioned in the following para 175)	NEPPO, Bahrain, Morocco
881.	173	Substantive	Seeds from the same country of origin may be mixed and blended, as may seeds from various origins <u>and different harvest years</u> .	Add "different harvest years" because temporal origin may be important for seeds.	Canada
882.	173	Substantive	Seeds from the same country of origin may be mixed and blended, as may seeds from various origins.	See comment in Para 169.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
883.	173	Substantive	Seeds <u>of the same crop variety</u> from the same country of origin may be mixed and blended, <del>as may seeds from various origins.</del>	Blended seeds should come from the same crop variety and country. Blending seeds from various origin undermine traceability and PRA and therefore not acceptable.	Ghana
884.	173	Substantive	Les deux types de mélanges peuvent concerner tant des semences provenant du même pays d'origine que des semences d'origines variées. <u>Les semences mélangées doivent provenir de la même variété, même producteur et même pays.</u>	Ce qui est dit rend impossible l'analyse du risque et la traçabilité.	Burundi
885.	173	Substantive	Les deux types de mélanges peuvent concerner tant des semences provenant du même pays d'origine que des semences d'origines variées.  <u>Ajout: les semences mélangées doivent provenir d'une même varité, même producteur et même pays</u>	cette proposition faciliterait l'analyse du risque phytosanitaire plus que les deux autres (172 et 173) qui la compliquent d'avantage	Gabon
886.	174	Editorial	Traceability for export and re-export of all original seed lots comprising the mixture or blend should be <u>retained and</u> guaranteed to <u>ensure that meet</u> the <u>phytosanitary import</u> requirements of the importing country <u>can be met for all components of the mixtur eor blend</u> .	Better wording for clarity and readability.	EPPO, Georgia, European Union, Serbia
887.	174	Editorial	Traceability for export and re-export of all original seed lots comprising the mixture or blend should <u>comply with</u> <del>be guaranteed to meet</del> the requirements of the importing country.	The original text does not provide guidance on how such a guarantee should be provided.	ISF*
888.	174	Substantive	<del>Traceability for export and re-export of all original seed lots comprising the mixture or blend should be guaranteed to meet the requirements of the importing country.</del>	No need such para (the seed certification is elaborated in the ISPM 12 mentioned in the following para 175)	NEPPO, Bahrain, Morocco

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
889.	174	Substantive	<u>All components of the mixture or blend must be traceable and the countries of origin must be listed on the phytosanitary certificate, in accordance with ISPM 12: 2011</u>  <del>Traceability for export and re-export of all original seed lots comprising the mixture or blend should be guaranteed to meet the requirements of the importing country.</del>	1. Suggest to move paragraph [175] below paragraph [173], which is also providing guidance on origin. 2. Delete paragraph [174] and add traceability component to paragraph [175].	Canada
890.	174	Substantive	Traceability for export and re-export of all original seed lots comprising the mixture or blend should be guaranteed to meet the requirements of the importing country.	See comment in Para 169.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
891.	174	Technical	<del>To assist t</del> Trace <del>backability</del> for export and re-export of all original seed lots comprising the mixture or blend should <del>be guaranteed to</del> meet the requirements of the importing country.	Trace back the relevant term under ISPM 12. Guaranteed not an appropriate term.	Australia
892.	175	Substantive	<del>All countries of origin must be listed on the phytosanitary certificate, in accordance with ISPM 12:2011.</del>	Move paragraph [175] to below paragraph [173], which also discusses origin.	Canada
893.	175	Substantive	All countries of origin must be listed on the phytosanitary certificate, in accordance with ISPM 12:2011.	See comment in Para 169.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
894.	175	Technical	All countries of origin must be listed on the phytosanitary certificate <u>to assist with traceback. The most revelant place to undertake traceba ck may be identified</u> , in accordance with ISPM 12:2011.	Introduction of the term traceback in consistency with the ISPM12:2011	New Caledonia*
895.	175	Technical	All countries of origin must be listed on the phytosanitary certificate, in accordance with ISPM 12:2011. <u>To assist with trace back, the most relevant place to undertake tr ace back may be defined.</u>	Additional guidance under ISPM 12.	Australia
896.	176	Substantive	In the case of a phytosanitary certificate for re-export, validated copies of the original phytosanitary certificates of the components of the mixture or blend should be attached to the re-export certificate.	See comment in Para 169.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
897.	176	Technical	In the case of a phytosanitary certificate for re-export, <u>the original or a certified</u> <del>validated</del> <del>copyies</del> of the original phytosanitary certificates of the components of the mixture or blend should be attached to the re-export certificate.	To align with wording is ISPM 12	EPPO, Georgia, European Union, Norway, Serbia, Algeria



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
898.	177	Editorial	<b>76. Record Keeping</b>	To align with numbering of separate paragraphs 5 and 6	EPPO, Georgia, European Union, Serbia
899.	178	Substantive	Because seeds may be stored for many years before being exported or re-exported, <u>NPPOs should retain phytosanitary records on (e.g. origin, phytosanitary procedures applied, and international movements) should be retained</u> for at least five years and <u>make them made</u> available to the NPPO of the importing country upon request.	ISPMs are written for NPPOs.	United States of America
900.	178	Substantive	Because seeds may be stored for many years before being exported or re-exported, records on origin, phytosanitary procedures applied and international movements should be retained for at least five years and <u>as long as the seed is in stock and</u> made available to the NPPO of the importing country upon request.	Records on seeds should be maintained and made available to the NPPO of importing country as long as seed is in stock.	Ghana
901.	178	Substantive	Because seeds may be stored for many years before being exported or re-exported, records on origin, phytosanitary procedures applied and international movements should be retained for at least <del>five</del> <u>ten</u> years and made available to the NPPO of the importing country upon request.	There are lots of seeds stored for more than five years.	Japan
902.	178	Substantive	Les semences pouvant être stockées pendant de nombreuses années avant d'être exportées ou réexportées, les données relatives à l'origine, aux procédures phytosanitaires qui ont été suivies et aux déplacements internationaux devraient être conservées au moins cinq ans <u>et aussi longtemps que la semence sera en stock</u> , et être communiquées à l'ONPV du pays importateur si celle-ci en fait la demande.	Ce ne serait pas logique de ne pas garder l'information d'une semence encore en stock !	Burundi
903.	178	Substantive	Les semences pouvant être stockées pendant de nombreuses années avant d'être exportées ou réexportées, les données relatives à l'origine, aux procédures phytosanitaires qui ont été suivies et aux déplacements internationaux devraient être conservées au moins cinq ans <u>et aussi longtemps que la semences sera en stock</u> , et être communiquées à l'ONPV du pays importateur si celle-ci en fait la demande.	Cela permettrait de garder l'information des semences tant qu'elles sont encore en stock	Gabon
904.	178	Technical	Because seeds may be stored for many years before being exported or re-exported, records on origin, phytosanitary procedures applied and international movements should be retained for at least five years and made available to the NPPO of the importing country upon request.  <u>Change retained time of records from "at least five years" to "at least three years".</u>	Five years requested is too long, that will be more expense, and not easy put in practice. Some countries, such as China, retained time of phytosanitary records is three years at present.	China
905.	178	Technical	Because seeds may be stored for many years before being exported or re-exported, records on origin, phytosanitary procedures applied and international	Better to specify who should keep the information and to whom it should be made available on	EPPO, Georgia,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			movements should be retained <u>by the operator</u> for at least five years and made available to the NPPOs of the <u>exporting and</u> importing country upon request.	request, this is both the NPPO of the exporting and the importing country depending on where the question arises.	European Union, Norway, Serbia, Algeria
906.	<a href="#">178</a>	Technical	Because seeds may be stored for many years before being exported or re-exported, records on origin, phytosanitary procedures applied and international movements should be retained for <u>at least five up to ten</u> years and made available to the NPPO of the importing country upon request.	While commercial seed may be used up to 5 years, seed lots of parental lines are often used for 10 years	ISF*
907.	<a href="#">179</a>	Editorial	This <u>appendix</u> <del>annex</del> is <u>not</u> a prescriptive part of the standard	For consistency with the purpose on the appendix	NEPPO, Bahrain, Morocco
908.	<a href="#">179</a>	Substantive	<del>This annex is a prescriptive part of the standard</del>	It should be an appendix rather than an annex	New Caledonia*
909.	<a href="#">179</a>	Substantive	<del>This annex is a prescriptive part of the standard</del> <u>This appendix is for reference purposes only and is not a prescriptive part of the standard</u>	To change from annex to appendix.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize, OIRSA
910.	<a href="#">179</a>	Substantive	<del>This annex is a prescriptive part of the standard</del> <u>This appendix is for reference purposes only and is not a prescriptive part of the standard.</u>	To change the term from "annex" to "appendix".	Japan
911.	<a href="#">180</a>	Substantive	<b>APPENDIX 1</b> <del>ANNEX</del> 1: Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish and spread	It should be an appendix rather than an annex.	New Caledonia*
912.	<a href="#">180</a>	Substantive	<del>ANNEX</del> <b>APPENDIX</b> 1: Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish and spread	This should be only for reference & not as a prescriptive. Recommend to focus only on pests actually present in the seed pathway with potential to establish and spread instead of current inclusion in subsequent paragraphs - to re-write following paragraphs.	Singapore, China, Thailand, Korea, Republic of, Ghana, Belize, OIRSA
913.	<a href="#">180</a>	Substantive	<del>ANNEX</del> <b>APPENDIX</b> 1: Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish and spread	This should only be for reference & not prescriptive. Recommend focusing only on pests actually present in the seed pathway with the potential to establish and spread.	Japan
914.	<a href="#">180</a>	Substantive	<b>ANNEX 1: Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish and spread</b>	This annex does not add value to the standard.	South Africa
915.	<a href="#">180</a>	Substantive	<del>ANNEX</del> <b>APPENDIX</b> 1: Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish <del>and spread</del>	Change to Appendix as this should not be a prescriptive part of the standard. This is guidance on pest groups. With the removal of [213] 2.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
				possible outcomes when evaluating whether seed can become a pathway.... This appendix is only about presence of pest groups on the seed pathway and their potential to establish. Not on their potential to spread.	
916.	180	Technical	<b>ANNEX 1: Guidance on the likelihood for pest groups to be present in consignments of seeds</b> <del>the seed pathway</del> and <b>possible outcome when evaluating whether seeds can be a pathway</b> <del>their potential to establish and spread</del>	Clearer wording, avoiding the use of "seed pathway", which is unclear. Moreover the annex does not cover spread.	EPPO, Georgia, European Union, Serbia
917.	180	Technical	<del>Appendix</del> <b>ANNEX 1: Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish and spread</b>	The ISPM is dealing with pest and not with pest groups	NEPPO, Bahrain, Morocco
918.	180	Technical	<del>ANNEX</del> <b>APPENDIX 1: Guidance on the likelihood for pest groups to be present in the seed pathway and their potential to establish and spread</b>	See comment in paragraph 54	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
919.	180	Technical	<b>ANNEX 1: Guidance on the likelihood for pest groups to be present in consignments of seeds</b> <del>the seed pathway</del> and <b>possible outcome when evaluating whether seeds can be a pathway</b> <del>their potential to establish and spread</del>	Clearer wording, avoiding the use of "seed pathway", which is unclear. Moreover the annex does not cover spread.	Norway
920.	181	Technical	<b>1. Pest Groups</b>  <u>Pests associated with seeds should be grouped into insects, fungi, bacteria, viruses, viroids, phytoplasm, nematodes and plants as pests.</u>	It's logically more reasonable.	China
921.	182	Editorial	Pests associated with seeds can be grouped based on information regarding their likelihood to be present in the seed pathway and their potential to establish and spread via this pathway <u>(item 1.1 of the standard)</u> . This information may be useful in conducting a pest risk analysis (PRA).	Addition of item 1.1 of the standard) for contextual clarification.	South Africa
922.	182	Technical	<u>In the following p</u> <del>ests associated with seeds are broadly can be</del> grouped based on <del>information regarding</del> their likelihood to be present in <u>consignments of seeds</u> <del>the seed pathway</del> and their potential to establish and spread via this pathway. This information may be useful in conducting a pest risk analysis (PRA).	Clearer wording, avoiding the use of the unclear wording "seed pathway"	EPPO, Georgia, European Union, Norway, Serbia
923.	182	Technical	Pests associated with seeds can be grouped based on information regarding their likelihood to be present in the seed pathway and their potential to establish and spread via this pathway. This information may be useful in conducting a pest risk analysis (PRA).	Paragraphs 197 and 198 refering to pests in general added at the end, because it could be applied to all pests.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<p><u>There is a limited, and sometimes conflicting, information available in the published literature regarding the seed transmissibility of some pests. In addition, a pest that has been proven to be seed-transmissible in one host is not necessarily seed-transmissible in all known hosts. Several determining factors, such as the capability of the host to support transmission and the level of host infection, should also be considered.</u></p> <p><u>National plant protection organizations (NPPOs) should consider in the wider determination of pest-host interaction that experimental hosts may not be hosts under field conditions. The interaction may be purely artificial (experimental conditions)</u></p>		
924.	183	Substantive	<b>1.1 Insects <u>and mites</u> in the field</b>	mites and schale insect some times associated with some seed (exs: coconut seed)	Indonesia
925.	183	Technical	<b>1.1 <del>Insects in the field</del> <u>Arthropods</u></b>  <u>1.1.1 Pre-harvest</u>	We propose to refer to arthropods because some examples of Acari are provided. For consistency we propose to refer to the stages during seed production pre-harvest or post-harvest	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
926.	184	Editorial	Insects in the field are pests that feed on the seed <u>s</u> or within the seed <u>s</u> during the plant growth and seed development period, before harvest.	Better wording	EPPO, Georgia, European Union, Serbia
927.	184	Editorial	Insects in the field are pests that feed <u>in and</u> on the seed <del>or within the seed</del> during the plant growth and seed development period, before harvest.	Simplification of the sentence structure.	ISF*
928.	184	Technical	Insects in the field <del>are</del> <u>can include</u> pests that feed on the seed or within the seed during the plant growth and seed development period, before harvest.	Not all insects in the field feed in or on the seed.	ISF*
929.	184	Technical	<del>Insects</del> <u>Arthropods</u> in the field are pests that feed on the seed or within the seed during the plant growth and seed development period, before harvest.	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
930.	185	Substantive	Insects in the field that <u>have a low probability</u> <del>are unlikely</del> to be present in the seed pathway:	Replacement of “are unlikely” with the addition of “low probability” to align it with PRA procedures.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
931.	185	Technical	Insects in the field that are unlikely to be present in <del>consignments of the seeds</del> <u>pathway</u> :	To avoid the use of the unclear wording "seed pathway"	EPPO, Georgia, European Union, Norway, Serbia
932.	185	Technical	<del>Insects</del> <u>Arthropods</u> in the field that are unlikely to be present in the seed pathway:	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
933.	186	Editorial	<ul style="list-style-type: none"> <li>External feeders: insects that feed on external parts of seeds are not attached to the seeds and will be dislodged during harvesting and cleaning.</li> </ul>	Better wording	EPPO, Georgia, European Union, Serbia
934.	186	Substantive	<ul style="list-style-type: none"> <li>External feeders: insects that feed on external parts of seeds are not attached to the seed and <u>may</u> <del>will</del> be dislodged during harvesting and cleaning.</li> </ul>	<ul style="list-style-type: none"> <li>Replacement of "will" with "may" reason being there may be probability that it is not dislodged.</li> </ul>	South Africa
935.	186	Technical	<ul style="list-style-type: none"> <li>External feeders: <del>insects arthropods</del> that feed on external parts of seeds <del>are not attached to the seed and</del> will be dislodged during harvesting and cleaning.</li> </ul>	See comment in paragraph 183. Text deleted for better reading	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
936.	187	Editorial	<ul style="list-style-type: none"> <li>Internal feeders <u>that cause</u> <del>ing</del> seed abortion: insects that feed on internal parts of seeds causing this damage will cause seeds to fall before maturity and harvest.</li> </ul>	Better wording	EPPO, Georgia, Serbia
937.	187	Editorial	<ul style="list-style-type: none"> <li>Internal feeders causing seed abortion: insects that feed on internal parts of seeds <del>causing this damage</del> will cause seed to fall before maturity and harvest.</li> </ul>	Simplification of the sentence structure.	ISF*
938.	187	Editorial	<ul style="list-style-type: none"> <li>Internal feeders <u>that cause</u> <del>ing</del> seed abortion: insects that feed on internal parts of seeds <del>causing this damage</del> will cause seeds to fall before maturity and harvest.</li> </ul>	Better and simpler wording.	European Union
939.	187	Substantive	<ul style="list-style-type: none"> <li>Internal feeders causing seed abortion: insects that feed on internal parts of seeds causing this damage <del>will</del> <u>may</u> cause seed to fall before</li> </ul>	Replacement of "will" with "may" reason being there may be probability that it is not dislodged.	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			maturity and harvest.		
940.	187	Technical	<ul style="list-style-type: none"> <li>Internal feeders causing seed abortion: <del>insects</del>-arthropods that feed on internal parts of seeds causing this damage will cause seed to fall before maturity and harvest.</li> </ul>	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
941.	188	Substantive	Insects in the field that may <u>have a high probability</u> be present in the seed pathway:	Addition of the indicated text; the proposed editing provides greater clarity and focus on contextual clarification and the use of correct terminology. It emphasizes the fundamental principles of pest risk analysis	South Africa
942.	188	Technical	Insects in the field that may be present in <u>consignments of</u> <del>the seeds</del> <u>pathway</u> :	To avoid the use of the unclear wording "seed patway"	EPPO, Georgia, European Union, Norway, Serbia
943.	188	Technical	<del>Insects</del> -Arthropods in the field that may be present in the seed pathway:	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
944.	189	Editorial	<ul style="list-style-type: none"> <li>Internal feeders of the mature seed: Insects found internally in mature seeds may be present during harvest and collected with healthy seeds. Further consideration would be needed to determine whether these insects would be visibly obvious during quality grading or quarantine inspection and whether they would survive storage environments and durations (e.g. <u>Bruchidae</u> <del>Bruchidae</del> spp. in certain host species).</li> </ul>	Scientific names should be in italics.	Canada
945.	189	Editorial	<ul style="list-style-type: none"> <li>Internal feeders of the mature seed: Insects found internally in mature seeds may be present during harvest and collected with healthy seeds. Further consideration would be needed to determine whether these insects would be visibly obvious during quality grading or quarantine inspection and whether they would survive storage environments and durations (e.g. <u>Bruchidae</u> <del>sae</del> spp. in certain host species).</li> </ul>	Correction	Ghana
946.	189	Editorial	<ul style="list-style-type: none"> <li>Insectes qui se nourrissent à l'intérieur des semences mûres: Les insectes que l'on trouve à l'intérieur des semences mûres peuvent être présents au moment de la récolte et être collectés en même temps que les semences saines. Il conviendrait d'approfondir l'examen pour</li> </ul>	pour éviter la confusion entre le nom d'une famille et celui du genre auquel on ajoute spp	Gabon

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			déterminer la mesure dans laquelle ces insectes apparaîtraient de manière flagrante lors du tri par catégorie de qualité ou lors de l'inspection de quarantaine et survivraient aux environnements et aux durées de stockage (par exemple, Bruchidae <del>spp.</del> chez certaines espèces d'hôtes).		
947.	189	Editorial	<ul style="list-style-type: none"> <li>Internal feeders of the mature seed: Insects found internally in mature seeds may be present during harvest and collected with healthy seeds. Further consideration would be needed to determine whether these insects would be visible<del>y-obvious</del> during quality grading or quarantine inspection and whether they would survive storage environments and durations (e.g. Bruchidae spp. in certain host species).</li> </ul>	Deletion of "obvious" for contextual clarification.	South Africa
948.	189	Editorial	<ul style="list-style-type: none"> <li>Internal feeders of the mature seed: <del>i</del>nsects found internally in mature seeds may be present during harvest and collected with healthy seeds. Further consideration would be needed to determine whether these insects would be visibly obvious during quality grading or quarantine inspection and whether they would survive storage environments and durations (e.g. Bruchidae spp. in certain host species).</li> </ul>	Uncapitalise for consistency with other colon sentences.	Australia
949.	189	Substantive	<ul style="list-style-type: none"> <li>Insectes qui se nourrissent à l'intérieur des semences mûres: Les insectes que l'on trouve à l'intérieur des semences mûres peuvent être présents au moment de la récolte et être collectés en même temps que les semences saines. Il conviendrait d'approfondir l'examen pour déterminer la mesure dans laquelle ces insectes apparaîtraient de manière flagrante lors du tri par catégorie de qualité ou lors de l'inspection de quarantaine et survivraient aux environnements et aux durées de stockage (par exemple, Bruch<del>es</del>idae <del>spp.</del> chez certaines espèces d'hôtes).</li> </ul>	Les règles de taxonomie veulent qu'on ajoute spp au nom du genre or ici on a mis le nom de la Famille. Il vaut donc mieux utiliser le nom commun.	Burundi
950.	189	Technical	<ul style="list-style-type: none"> <li>Internal feeders of the mature seed: Insects <del>feeding</del><del>found</del> internally in mature seeds may be present during harvest and collected with <del>healthy</del> seeds. Further consideration would be needed to determine whether these insects would be <del>obviously</del> visible<del>y-obvious</del> during quality grading or quarantine inspection and whether they would survive storage <del>conditions</del><del>environments</del> and durations (e.g. Bruchidae spp. in certain</li> </ul>	Clearer wording actually better in lign with what is meant.	EPPO, Georgia, European Union, Norway, Serbia



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			host species).		
951.	189	Technical	<ul style="list-style-type: none"> <li>Internal feeders of the mature seed: <del>Insects</del> <u>Arthropods</u> found internally in mature seeds may be present during harvest and collected with <del>healthy</del> seeds. Further consideration <u>during pest risk management stage</u> would be needed to determine whether these <del>insects</del> <u>arthropods</u> would be visibly obvious during quality grading or <del>quarantine</del> inspection and whether they would survive storage <del>environments and durations</del> <u>conditions</u> (e.g. <u>species of the family</u> Bruchidae <del>spp.</del> in certain host species).</li> </ul>	"Insects" replaced by "arthropods" as per comment in paragraph 183. The word "Healthy" was deleted because does not add meaning to the context. Text added to clarify the stage of PRA. "Storage environments and durations" replaced by "storage conditions" which includes both environment and duration. Bruchidae is an entire family. The example does not give clear references, if an example will be included it should be clear indicating the sps and host.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
952.	190	Technical	<b>1.1.2 <del>Stored product insects</del> <u>Post-harvest</u></b>	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
953.	191	Substantive	Stored product insects, while they are dependent on opportunistic storage conditions and are unlikely to be present, can infest seeds after harvest, particularly if the seeds are stored under poor conditions. <del>Given the high value of seeds for planting, it is unlikely that commercial seeds would be stored in a manner that would provide stored product insects with an opportunity to infest the seeds.</del>	The last sentence has no value add and redundant.	Singapore
954.	191	Substantive	Stored product insects, while they are dependent on opportunistic storage conditions and are unlikely to be present, can infest seeds after harvest, particularly if the seeds are stored under poor conditions. <del>Given the high value of seeds for planting, it is unlikely that commercial seeds would be stored in a manner that would provide stored product insects with an opportunity to infest the seeds.</del>	No value add.	China, Korea, Republic of, Ghana, Belize
955.	191	Substantive	Stored product insects, while they are dependent on opportunistic storage conditions and are unlikely to be present, can infest seeds after harvest, particularly if the seeds are stored under poor conditions. <del>Given the high value of seeds for planting, it is unlikely that commercial seeds would be stored in a manner that would provide stored product insects with an opportunity to infest the seeds.</del>	not necessary.	Thailand
956.	191	Substantive	Stored product insects, while they are dependent on opportunistic storage conditions and are unlikely to be present, can infest seeds after harvest, particularly if the seeds are stored under poor conditions. <del>Given the high value of seeds for planting, it is unlikely that commercial seeds would be stored in a manner that would provide stored product insects with an opportunity to infest</del>	Delete second sentence as it not always the case.	Canada

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>the seeds.</del>		
957.	191	Substantive	Stored product insects, <del>while they are dependent on opportunistic storage conditions and are unlikely to be present,</del> can infest seeds after harvest, <del>particularly if the seeds are stored under poor conditions.</del> Given the high value of seeds for planting, it is unlikely that commercial seeds would be stored in a manner that would provide stored product insects with an opportunity to infest the seeds.	• Deletion of the texts for contextual clarification.	South Africa
958.	191	Substantive	Stored product insects, while they are dependent on opportunistic storage conditions and are unlikely to be present, can infest seeds after harvest, particularly if the seeds are stored under poor conditions. <del>Given the high value of seeds for planting, it is unlikely that commercial seeds would be stored in a manner that would provide stored product insects with an opportunity to infest the seeds.</del>	This is an opinion and not all seed that is moved globally is of a 'commercial' quality.	Australia
959.	191	Technical	Stored product insects, while they are dependent on opportunistic storage conditions <del>and are unlikely to be present,</del> can infest seeds after harvest, particularly if the seeds are stored under poor conditions. <del>Given the high value of seeds for planting, it is unlikely that commercial seeds would be stored in a manner that would provide stored product insects with an opportunity to infest the seeds.</del> <u>(e.g. high moisture conditions or the presence of previously stored seeds).</u> Good storage conditions, as generally applied for high value seeds, will greatly decrease the likelihood of stored product insects to feed on seeds.	Use better and clearer wording better explaining the meaning. The last sentence is reworded to express it more generally.	EPPO, Georgia, European Union, Norway, Serbia
960.	191	Technical	Stored product insects, while they are dependent on opportunistic storage conditions and are unlikely to be present, can infest seeds after harvest, particularly if the seeds are stored under poor conditions. Given the high value of seeds for planting, it is unlikely that <del>commercial</del> seeds would be stored in a manner that would provide stored product insects with an opportunity to infest the seeds.	All seed is stored well.	ISF*
961.	191	Technical	Stored product <del>insects</del> <u>arthropods</u> , while they are dependent on opportunistic storage conditions and are unlikely to be present, can infest seeds after harvest, particularly if the seeds are stored under poor conditions. Given the high value of seeds <del>for planting</del> , it is unlikely that commercial seeds would be stored in a manner that would provide stored product <del>insects</del> <u>arthropods</u> with an opportunity to infest the seeds.	"Insects" replaced by "Arthropods" as per comment in paragraph 183. For planting was deleted, because is redundant (ISPM 5)	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
962.	192	Substantive	Stored product insects that <u>have a low probability</u> <del>are unlikely</del> to be present in the seed pathway:	Replacement of "are unlikely" with the addition of "low probability" to align it with PRA procedures.	South Africa
963.	192	Technical	Stored product insects that are unlikely to be present in <u>consignments of the</u> <del>seeds</del> <u>pathway</u> :	To avoid the unclear wording "seed pathway"	EPPO, Georgia, European Union, Norway, Serbia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
964.	192	Technical	Stored product <del>insects</del> <u>arthropods</u> that are unlikely to be present in the seed pathway:	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
965.	193	Editorial	<ul style="list-style-type: none"> <li>External feeders: insects that feed on external parts of seeds will destroy the seed and pose a risk <del>only</del> as contaminants. External feeders are not attached to the seed. Secondary pests (e.g. <i>Mycetophagus</i> spp., <i>Acarus</i> spp., <i>Liposcelis</i> spp.) may also be present if there is poor sanitation causing excessive extraneous matter.</li> </ul>	Editorial correction.	ISF*
966.	193	Substantive	<ul style="list-style-type: none"> <li>External feeders: insects that feed on external parts of seeds <del>may</del> <u>will</u> destroy the seed and pose a risk only as contaminants. External feeders are not attached to the seed. <del>Secondary pests (e.g. <i>Mycetophagus</i> spp., <i>Acarus</i> spp., <i>Liposcelis</i> spp.) may also be present if there is poor sanitation causing excessive extraneous matter. Other storage organism may also be present if there are poor storage conditions.</del></li> </ul>	Replacement of "will" with "may" reason being that there may be a probability and emphasise on the fundamental principles of pest risk analysis. Replacement of the last sentence with the addition of the new sentence for contextual clarification on secondary pests.	South Africa
967.	193	Technical	<ul style="list-style-type: none"> <li>External feeders: insects that feed on <u>, but are not attached to,</u> external parts of seeds will destroy the seed and pose a risk only as contaminants. External feeders are not attached to the seed. Secondary pests (e.g. <i>Mycetophagus</i> spp., <i>Acarus</i> spp., <i>Liposcelis</i> spp.) may also be present if there is poor sanitation <del>or</del> <u>causing</u> excessive extraneous matter.</li> </ul>	Clearer wording, better expressing the meaning.	EPPO, Georgia, Serbia
968.	193	Technical	<ul style="list-style-type: none"> <li>External feeders: <del>insects</del> <u>arthropods</u> that feed on external parts of seeds <del>will destroy the seed and pose a risk only as contaminants. External feeders are not attached to the seed. Secondary</del> <u>Some</u> pests (e.g. <i>Mycetophagus</i> spp., <i>Acarus</i> spp., <i>Liposcelis</i> spp.) may also be present if there is poor sanitation causing excessive extraneous matter.</li> </ul>	"Insects" replaced by "arthropods" as per comment in paragraph 183. Reference to the risk as "contaminant" was deleted because contaminating pests not necessarily pose a risk. Sentence deleted because is redundant, in addition it is not a good wording to say that an insect is attached to the seed. "Secondary" was replaced by "some" because there is no other mention of "secondary pests" in the text and if they are mentioned an explanation would be needed.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
969.	193	Technical	<ul style="list-style-type: none"> <li>External feeders: insects that feed on <u>, but are not attached to,</u> external parts of seeds will destroy the seed and pose a risk only as</li> </ul>	Clearer wording, better expressing the meaning.	European Union

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			contaminants. <del>External feeders are not attached to the seed.</del> Secondary pests (e.g. <i>Mycetophagus</i> spp., <i>Acarus</i> spp., <i>Liposcelis</i> spp.) may also be present if there is poor sanitation <del>or causing</del> excessive extraneous matter.		
970.	193	Technical	<ul style="list-style-type: none"> <li>External feeders: insects that feed on <u>but are not attached to</u> external parts of seeds will destroy the seed and pose a risk only as contaminants. <del>External feeders are not attached to the seed.</del> Secondary pests (e.g. <i>Mycetophagus</i> spp., <i>Acarus</i> spp., <i>Liposcelis</i> spp.) may also be present if there is poor sanitation <del>or causing</del> excessive extraneous matter.</li> </ul>	Clearer wording, better expressing the meaning.	Norway
971.	194	Substantive	Stored product insects that may <u>have a high probability</u> be present in the seed pathway:	Addition of the wording "have high probability" to provide clarity on risk ratings in terms of ISPM 11 (2004).	South Africa
972.	194	Technical	Stored product insects that may be present in <u>consignments of the seeds</u> <del>pathway:</del>	To avoid the unclear wording "seed pathway"	EPPO, Georgia, European Union, Norway, Serbia
973.	194	Technical	Stored product <del>insects</del> <u>arthropods</u> that may be present in the seed pathway:	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
974.	195	Editorial	<ul style="list-style-type: none"> <li>Internal feeders: insects that feed on internal parts of seeds can infest seeds if <del>the seeds</del> <u>they</u> are left exposed for a period before packaging. Consideration should be given as to the likelihood of poor storage conditions, whether infested seeds would be detectable and whether the insect would survive the transport environment.</li> </ul>	Simplification of the sentence.	ISF*
975.	195	Substantive	<ul style="list-style-type: none"> <li>Internal feeders: insects that feed on internal parts of seeds can infest seeds if the seeds are left exposed for a period before packaging. Consideration should be given as to the likelihood of <u>infestation during</u> poor storage conditions. <del>whether infested seeds would be detectable and whether the insect would survive the transport environment.</del></li> </ul>	Deletion of the last sentence and addition of "infestation during" for contextual clarification	South Africa

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
976.	195	Technical	<ul style="list-style-type: none"> <li>Internal feeders: <del>insects</del>-arthropods that feed on internal parts of seeds can infest seeds if the seeds are left exposed for a period before packaging. Consideration should be given as to the likelihood of poor storage conditions, whether infested seeds would be detectable and whether the <del>insect</del>-arthropod would survive the transport <del>environment</del> <u>conditions</u>.</li> </ul>	See comment in paragraph 183. Transport environment was replaced by the more common expression "transport conditions"	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
977.	196	Technical	<del>1.3 Pests other than insects</del>	Concepts of this section (paragraphs 197 and 198) were moved at the end of paragraph 182. See comment in paragraph 182	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
978.	197	Substantive	There is limited, and at times conflicting, information available in the published literature regarding the seed transmissibility of pathogens (e.g. <i>Hop latent viroid</i> in tomato). In addition, a pathogen that has been proven to be seed-transmissible in one host is not necessarily seed-transmissible in all known hosts. This issue is complicated by several determining factors, such as the capability of the host to support transmission and the level of host infection.	regarding: "...seed transmissibility of pathogens (" Comment: Keep pests as nematodes are included	ISTA*
979.	197	Technical	There is limited, and at times conflicting, information available <del>in the published literature</del> regarding the seed transmission <del>ability</del> of <del>pests other than insects</del> pathogens (e.g. <i>Hop latent viroid</i> in tomato). In addition, a <del>pest</del> pathogen that has been proven to be seed-transmitted <del>ssible</del> in one host is not necessarily seed-transmitted <del>ssible</del> in all known hosts. This issue is complicated by <del>many</del> <u>several</u> determining factors, such as the capability of <del>a</del> the host to support transmission <del>and</del> the level of host infection <del>prior to seed formation</del> .	Clearer wording , use the word 'pest' in stead of 'pathogens' and 'seed transmitted' in stead of 'seed trnsmissible' for consistency and clarity.	EPPO, Georgia, European Union, Norway, Serbia
980.	197	Technical	<del>There is limited, and at times conflicting, information available in the published literature regarding the seed transmissibility of pathogens (e.g. Hop latent viroid in tomato). In addition, a pathogen that has been proven to be seed-transmissible in one host is not necessarily seed-transmissible in all known hosts. This issue is complicated by several determining factors, such as the capability of the host to support transmission and the level of host infection.</del>	See comment in paragraph 182	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
981.	198	Editorial	<del>National plant protection organizations (NPPOs) should consider in the wider determination of pathogen–host interaction that experimental hosts may not be true hosts. The interaction may be purely artificial and not demonstrative that infection would occur in the natural environment.</del>	Redundant text.	European Union
982.	198	Substantive	<del>National plant protection organizations (NPPOs) should consider in the wider determination of pathogen–host interaction that experimental hosts may not be true hosts. The interaction may be purely artificial and not demonstrative that infection would occur in the natural environment.</del>	Delete paragraph because it is not necessary information as this experimental host vs true host concept is not specific to seeds e.g. Determination of host status of fruit to fruit fly.	Canada

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
983.	198	Technical	National plant protection organizations (NPPOs) should consider in their wider determination of <del>pest</del> pathogen–host interaction that <u>plants that may host certain pests under experimental conditions</u> <del>hosts may not be true hosts under natural conditions. The interaction may be purely artificial and not demonstrative that infection would occur in the natural environment.</del>	Better wording for clarity and the last sentence does not add anything.	EPPO, Georgia, European Union, Norway, Serbia
984.	198	Technical	<del>National plant protection organizations (NPPOs) should consider in the wider determination of pathogen–host interaction that experimental hosts may not be true hosts. The interaction may be purely artificial and not demonstrative that infection would occur in the natural environment.</del>	See comment in paragraph 182	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
985.	199	Technical	<b>1.3.1 Fungi <u>and fungal-like organisms</u></b>	To also cover the fungal-like organisms.	EPPO, Georgia, European Union, Norway, Serbia
986.	199	Technical	<b>1.23.1 Fungi</b>	See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
987.	200	Editorial	Fungal species can be associated with seeds both superficially and internally, though many are not considered to be pathogenic. However, <u>some fungi</u> <del>there are species that</del> can cause seed rot, necrosis, reduced germination and disease in resultant seedlings <u>and plants</u> . Seed fungal pathogens can be grouped as field pathogens and storage pathogens. Fungi may be present on the surface of seeds or mixed with seeds as contaminants, and can be introduced and spread to the host crop or to other crops (e.g. by soil contamination). Fungi can also be present in the teguments or in the internal part of the seed and be introduced and spread to the host crop in this way.	Better wording	EPPO, Georgia, European Union, Serbia
988.	200	Substantive	<del>Fungal species can be associated with seeds both superficially and internally, though many are not considered to be pathogenic. However, there are species that can cause seed rot, necrosis, reduced germination and disease in resultant seedlings.</del> Seed fungal pathogens can be grouped as field pathogens and storage pathogens. Fungi may be present on the surface of seeds or mixed with seeds as contaminants, and can be introduced and spread to the host crop or to other crops (e.g. by soil contamination). Fungi can also be present in the teguments or in the internal part of the seed and be introduced and spread to the host crop in this way.	Delete first two sentences of this paragraph because the sentence is incorrect as many fungi are considered pathogenic and can be associated with seed.	Canada
989.	200	Technical	Fungal species can be associated with seeds both superficially and internally, though many are not considered to be pathogenic. However, there are species that can cause seed rot, necrosis, reduced germination and disease in resultant	Not only soil but all growing media are relevant	EPPO, Georgia, European Union,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			seedlings. Seed fungal pathogens can be grouped as field pathogens and storage pathogens. Fungi may be present on the surface of seeds or mixed with seeds as contaminants, and can be introduced and spread to the host crop or to other crops (e.g. by <del>soil</del> contamination <u>of the growing medium</u> ). Fungi can also be present in the teguments or in the internal part of the seed and be introduced and spread to the host crop in this way.		Serbia
990.	200	Technical	Fungal species can be associated with seeds both superficially and internally, though many are not considered to be pathogenic. However, there are species that can cause seed rot, necrosis, reduced germination and disease in resultant seedlings. Seed fungal pathogens can be grouped as field pathogens and storage pathogens. Fungi may be present on the surface of seeds or mixed with seeds as contaminants, and can be introduced and spread to the host crop or to other crops (e.g. by soil contamination). Fungi can also be present in the <u>in</u> teguments or in the internal part of the seed and be introduced and spread to the host crop in this way.	Correction of a technical term.	ISF*
991.	200	Technical	Fungal species can be associated with seeds both <del>superficially externally</del> and internally, though many are not considered to be pathogenic. However, there are species that can cause seed rot, necrosis, reduced germination and <del>disease in infestation of resultant</del> seedlings. <del>Seed fungal pathogens can be grouped as field pathogens and storage pathogens. Fungi may be present on the surface of seeds or mixed with seeds as contaminants, and can be introduced and spread to the host crop or to other crops (e.g. by soil contamination). Fungi can also be present in the teguments or in the internal part of the seed and be introduced and spread to the host crop in this way.</del>	"Superficially" replaced by "externally" for consistency. Sentences deleted because no information is given for field or storage pathogens, nor for contaminants.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
992.	200	Technical	Fungal species can be associated with seeds both superficially and internally, though many are not considered to be pathogenic. However, there are species that can cause seed rot, necrosis, reduced germination and disease in resultant seedlings <u>or plants</u> . Seed fungal pathogens can be grouped as field pathogens and storage pathogens. Fungi may be present on the surface of seeds or mixed with seeds as contaminants, and can be introduced and spread to the host crop or to other crops (e.g. by <del>soil</del> contamination <u>of the growing media</u> ). Fungi can also be present in the teguments or in the internal part of the seed and be introduced and spread to the host crop in this way.	to be more complete	Norway
993.	201	Editorial	<b>1.3.2 Bacteria</b>	Editorial change as a consequence of comments. See comment in paragraph 183.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
994.	202	Editorial	<u>Although not all b</u> Bacteria <u>are seed-transmitted, bacteria</u> can be found on <u>or within</u> seeds as either external or internal infections. <del>Not all bacteria are seed-</del>	Better wording, makes it more readable.	EPPO, Georgia, European Union,



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>transmitted.</del> Bacteria associated with seeds are not capable of establishment without seed transmission.		Serbia
995.	202	Technical	Bacteria can be found on seeds as either external or internal infections. Not all bacteria are seed-transmitted. <del>Bacteria associated with seeds are not capable of establishment without seed transmission.</del>	There are exceptions. Furthermore, if they are not seed-Transmitted, but they are seed-borne, they could be a source of primary inoculum to cause new infections in the field, and they could establish if the climatic required conditions and hosts are present .	Chile, Peru
996.	203	Editorial	<b>1.43.3 Viruses</b>	Editorial change as a consequence of comments. See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
997.	204	Editorial	<u>Not all viruses are seed-transmitted.</u> Viruses as a general rule are only seed-transmitted <del>ssible</del> if the seed embryo is infected, although there are exceptions in the <i>Tobamovirus</i> genus. <del>Not all viruses are seed-transmitted.</del>	Better wording	EPPO, Georgia, European Union, Serbia
998.	204	Technical	Viruses as a general rule are only seed-transmissible if the seed embryo is infected, although there are exceptions in the <i>Tobamovirus</i> genus. Not all viruses are seed-transmitted. <u>For seed-transmitted viruses, the percentage of infected seedlings is often lower than the percentage of infested seeds.</u>	A technical notion that is important to add.	EPPO, Georgia, European Union, Serbia
999.	205	Editorial	<b>1.53.4 Viroids</b>	Editorial change as a consequence of comments. See comment in paragraph 183	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1000.	206	Editorial	Seed transmission has been demonstrated for many <u>but not all</u> viroids. <del>but there are also those for which it has not been demonstrated. Not all viroids are seed-transmitted.</del>	Much shorter wording to say the same.	EPPO, Georgia, European Union, Serbia
1001.	207	Technical	<b>1.63.5 Phytoplasmas and spiroplasmas</b>	See comment in paragraph 183. There are spiroplasmas that could be associated with seeds.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1002.	208	Editorial	<u>Seed transmission of</u> <del>Phytoplasmas are primarily known to be spread by infected vegetative propagation material and insect vectors. The seed transmissibility for</del> phytoplasmas has not been demonstrated.	Much shorter wording to say the same.	EPPO, Georgia, European Union, Serbia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1003.	208	Technical	<del>Phytoplasmas are primarily known to be spread by infected vegetative propagation material and insect vectors.</del> The seed transmissibility for phytoplasmas <del>has not been demonstrated</del> <u>is not usual. However there are evidences of seed transmissibility for some phytoplasmas and spiroplasmas.</u>	Sentence deleted, because this ISPM is not intended to provide guidance on vegetative propagation material, what is relevant is the information on seed transmissibility. There are evidences that phytoplasmas and spiroplasmas could be seed transmitted. (Bertaccini, A., Duduk, B., Paltrinieri, S. N. Contaldo. 2014. Phytoplasmas and Phytoplasma Diseases: A Severe Threat to Agriculture. American Journal of Plant Sciences 5: 1763-1788 and Agarwal y Sinclair (1996) - Principles of seed pathology. Second edition.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1004.	209	Editorial	<b>1.7.3.6 Nematodes</b>	Editorial change as a consequence of comments. See comment in para. 183.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1005.	210	Editorial	The majority of <del>plant-parasitic</del> nematode <del>species</del> are <del>recorded as known to be</del> internal or external root parasites, <del>however though</del> there are some species known to attack above-ground plant parts <del>including such as</del> seeds (e.g. <i>Ditylenchus dipsaci</i> (Kuehn) Filipjev and <i>Anguina tritici</i> (Steinbuch) Chitwood). Nematode species identified as seed-transmissible quarantine pests belong to species that are known to be endoparasites (internal feeders of above-ground plant parts). But other species are ectoparasites (e.g. <i>Aphelenchoides besseyi</i> Christie) and have dormant stages in the seed or on plant debris around seeds.	Better wording to increase clarity	EPPO, Georgia, European Union, Serbia
1006.	210	Editorial	The majority of nematodes are known to be internal or external root parasites, though there are some species known to attack above-ground plant parts such as seeds (e.g. <i>Ditylenchus dipsaci</i> (Kuehn) Filipjev and <i>Anguina tritici</i> (Steinbuch) Chitwood). Nematode species identified as seed- <del>transmissible</del> <u>transmitted</u> quarantine pests belong to species that are known to be endoparasites (internal feeders of above-ground plant parts). But other species are ectoparasites (e.g. <i>Aphelenchoides besseyi</i> Christie) and have dormant stages in the seed or on plant debris around seeds.	Consistent use of terms.	ISF*
1007.	210	Substantive	The majority of nematodes are known to be internal or external root parasites, though there are some species known to attack above-ground plant parts such as seeds (e.g. <i>Ditylenchus dipsaci</i> (Kuehn) Filipjev and <i>Anguina tritici</i> (Steinbuch) Chitwood). Nematode species identified as seed-transmissible quarantine pests belong to species that are known to be endoparasites (internal feeders of above-ground plant parts). But other species are ectoparasites (e.g. <i>Aphelenchoides besseyi</i> Christie) and have dormant stages in the seed or on plant debris <u>and soil and related matter</u> around seeds.	Add "and soil and related matter" because soil peds mixed with seed are a pathway for pests.	Canada

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1008.	210	Technical	The majority of nematodes are known to be internal or external root parasites, though there are some species known to attack above-ground plant parts such as seeds (e.g. <i>Ditylenchus dipsaci</i> (Kuehn) Filipjev and <i>Anguina tritici</i> (Steinbuch) Chitwood) and <i>Anguina agrostis</i> (Steinbuch) Filipjev). Nematode species identified as seed-transmitted <del>regulated</del> <del>sible</del> <del>quarantine</del> pests belong to species that are known to be <del>both foliar</del> endoparasites and <del>(internal feeders of above-ground plant parts)</del> . But other species are ectoparasites (e.g. <i>Aphelenchoides besseyi</i> Christie) and have dormant stages in the seeds or on plant debris around seeds.	Addition of example and better wording	EPPO, Georgia, Serbia
1009.	210	Technical	<del>The majority of nematodes are known to be internal or external root parasites, though there are some species of nematodes known to attack above-ground plant parts such as seeds (e.g. <i>Ditylenchus dipsaci</i> (Kuehn) Filipjev and <i>Anguina tritici</i> (Steinbuch) Chitwood) and <i>Aphelenchoides besseyi</i> Christie).</del> Nematodes may be endoparasites (internal feeders) or ectoparasites (external feeders). Nematode species identified as seed-transmissible <del>quarantine</del> pests belong to species that are known to be endoparasites <del>(internal feeders of above-ground plant parts)</del> . But there are also other some species that are ectoparasites <del>(e.g. <i>Aphelenchoides besseyi</i> Christie)</del> and have dormant stages in the seed <del>(e.g. <i>Aphelenchoides besseyi</i> Christie) or become endoparasitic invading inflorescence and developing seeds (e.g. <i>Anguina tritici</i> (Steinbuch) on plant debris around seeds).</del>	Paragraph reworded to clarify the examples. The condition of endo or ectoparasitic is independent of the plant part affected, and all examples given attack above ground parts. <i>Anguina tritici</i> may become endoparasitic and invade flowers and seeds	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1010.	210	Technical	The majority of nematodes are known to be internal or external root parasites, though there are some species known to attack above-ground plant parts such as seeds (e.g. <i>Ditylenchus dipsaci</i> (Kuehn) Filipjev and <i>Anguina tritici</i> (Steinbuch) Chitwood) and <i>Anguina agrostis</i> (Steinbuch) Filipjev). Nematode species identified as seed-transmitted <del>regulated</del> <del>sible</del> <del>quarantine</del> pests belong to species that are known to be <del>both foliar</del> endoparasites and <del>(internal feeders of above-ground plant parts)</del> . But other species are ectoparasites (e.g. <i>Aphelenchoides besseyi</i> Christie) and have dormant stages in the seeds or on plant debris around seeds.	Addition of example and better wording.	European Union
1011.	210	Technical	The majority of <u>plant parasitic</u> nematodes are known to be internal or external root parasites, though there are some species known to attack above-ground plant parts such as seeds (e.g. <i>Ditylenchus dipsaci</i> (Kuehn) Filipjev and <i>Anguina tritici</i> (Steinbuch) Chitwood). Nematode species identified as seed-transmissible quarantine pests belong to species that are known to be endoparasites (internal feeders of above-ground plant parts). But other species are ectoparasites (e.g. <i>Aphelenchoides besseyi</i> Christie) and have dormant stages in the seed or on plant debris around seeds.	Some nematodes are not parasitic to plants. This needs qualifying.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1012.	<a href="#">211</a>	Technical	<b>1.83.7 Plants as pests(Weeds)</b>	Although plants as pests is the term used in ISPM, in the context of seed industry is more common the term weed, in addition paragraph 212 refers to weed seeds	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1013.	<a href="#">212</a>	Technical	<u>parasitic plants and</u> <del>W</del> weed seeds may be introduced into a country when moving seeds for planting internationally.	Some parasitic plant seeds also can be introduced when moving seeds.	China
1014.	<a href="#">212</a>	Technical	<u>Seeds of plants as pests (e.g. wWeeds or invasive alien plants)</u> <del>seeds</del> may be introduced into a country when moving seeds for planting internationally.	To better express the scope.	EPPO, Georgia, Norway, Serbia
1015.	<a href="#">212</a>	Technical	Weed seeds may be introduced into a country <u>as contaminating pests</u> <del>when moving seeds for planting internationally.</del>	To clarify	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1016.	<a href="#">212</a>	Technical	<u>Seeds of plants as pests (e.g. wWeeds or invasive alien plants)</u> <del>seeds</del> may be introduced <u>as contaminants in seed lots</u> into a country when moving seeds for planting internationally.	To better express the scope and exoress that they are contaminants then. General remark: can more guidance be given to NPPOs on seeds of plants as pests in this section?	European Union
1017.	<a href="#">213</a>	Editorial	<b>2. Possible Outcomes When Evaluating Whether Seed<u>s</u> Can Be a Pathway <u>for a quarantine pest</u></b>	To express that this only applies to Q pests	EPPO, Georgia, European Union, Serbia
1018.	<a href="#">213</a>	Substantive	<del>2. Possible Outcomes When Evaluating Whether Seed Can Be a Pathway</del>	Section 2 is not mentioned in the title of the annex/appendix. - entire section 2 seemed irrelevant in this draft. Proposed to delete the entire section 2.	Singapore, China, Korea, Republic of, Ghana, Belize
1019.	<a href="#">213</a>	Substantive	<del>2. Possible Outcomes When Evaluating Whether Seed Can Be a Pathway</del>	This section is clearly defined in ISPM 11.	Australia
1020.	<a href="#">213</a>	Technical	<del>2. Possible Outcomes When Evaluating Whether Seed Can Be a Pathway</del>  <u>If seeds can be a pathway for the introduction and spread of potential regulated pests, PRA should continue and phytosanitary measures may be considered during pest risk management stage.</u>	We propose to delete point 2, because this appendix is to provide guidance on the likelihood of a pest to be present in the seed pathway, so refers to first stages of PRA, phytosanitary measures would be considered in stage 3 of PRA. If during first stages it is concluded that seeds are not a pathway PRA stops Sentence added to substitute deleted section 2.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina


Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1021.	214	Substantive	<ul style="list-style-type: none"> <li>○ <del>Phytosanitary measures may be considered when:</del></li> </ul>	Refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize
1022.	214	Substantive	<ul style="list-style-type: none"> <li>○ <del>Phytosanitary measures may be considered when:</del></li> </ul>	Delete this paragraph because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada
1023.	214	Substantive	<ul style="list-style-type: none"> <li>○ <del>Phytosanitary measures may be considered when:</del></li> </ul>	Delete. See comment at [213].	Australia
1024.	214	Technical	<ul style="list-style-type: none"> <li>○ <del>Phytosanitary measures may be considered when:</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1025.	215	Editorial	<ul style="list-style-type: none"> <li>• <del>The plant species is a host, and its seeds can be a pathway for entry and the pest is able can lead to establishment of the pest</del></li> </ul>	Better wording	EPPO, Georgia, European Union, Serbia
1026.	215	Substantive	<ul style="list-style-type: none"> <li>• <del>plant species is a host, and seeds can be a pathway for entry and can lead to establishment of the pest</del></li> </ul>	Refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize
1027.	215	Substantive	<ul style="list-style-type: none"> <li>• <del>plant species is a host, and seeds can be a pathway for entry and can lead to establishment of the pest</del></li> </ul>	Delete paragraph 215 because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada
1028.	215	Substantive	<ul style="list-style-type: none"> <li>• <del>plant species is a host, and seeds can be a pathway for entry and can lead to establishment of the pest</del></li> </ul>	Delete. See comment at [213].	Australia
1029.	215	Technical	<ul style="list-style-type: none"> <li>• <del>plant species is a host, and seeds can be a pathway for entry and can lead to establishment of the pest</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1030.	216	Editorial	<ul style="list-style-type: none"> <li>• <del>The plant species is not a host, but seeds can be a pathway for entry (contaminating pest) which and can lead to establishment of the pest.</del></li> </ul>	Clearer wording	EPPO, Georgia, European Union, Serbia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1031.	<a href="#">216</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) and can lead to establishment of the pest.</del></li> </ul>	Refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize
1032.	<a href="#">216</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) and can lead to establishment of the pest.</del></li> </ul>	Delete paragraph 216 because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada
1033.	<a href="#">216</a>	Substantive	<ul style="list-style-type: none"> <li>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) and can lead to establishment <u>and spread</u> of the pest.</li> </ul>	Addition of “and spread” to be consistent with the fundamental terms of pest risk analysis and IPPC.	South Africa
1034.	<a href="#">216</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) and can lead to establishment of the pest.</del></li> </ul>	Delete. See comment at [213].	Australia
1035.	<a href="#">216</a>	Technical	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) and can lead to establishment of the pest.</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1036.	<a href="#">217</a>	Substantive	<ul style="list-style-type: none"> <li><del>Phytosanitary measures should not be considered when:</del></li> </ul>	refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize
1037.	<a href="#">217</a>	Substantive	<ul style="list-style-type: none"> <li><del>Phytosanitary measures should not be considered when:</del></li> </ul>	Delete paragraph 217 because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada
1038.	<a href="#">217</a>	Substantive	<ul style="list-style-type: none"> <li><del>Phytosanitary measures should not be considered when:</del></li> </ul>	Delete. See comment at [213].	Australia
1039.	<a href="#">217</a>	Technical	<ul style="list-style-type: none"> <li><del>Phytosanitary measures should not be considered when:</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1040.	<a href="#">218</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is a host, but seeds are not a pathway for pest introduction</del></li> </ul>	refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1041.	<a href="#">218</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is a host, but seeds are not a pathway for pest introduction</del></li> </ul>	Delete paragraph 218 because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada
1042.	<a href="#">218</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is a host, but seeds are not a pathway for pest introduction</del></li> </ul>	Delete. See comment at [213].	Australia
1043.	<a href="#">218</a>	Technical	<ul style="list-style-type: none"> <li><del>plant species is a host, but seeds are not a pathway for pest introduction</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1044.	<a href="#">219</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is a host and seeds can be a pathway for entry but cannot lead to establishment of the pest</del></li> </ul>	refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize
1045.	<a href="#">219</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is a host and seeds can be a pathway for entry but cannot lead to establishment of the pest</del></li> </ul>	Delete paragraph 219 because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada
1046.	<a href="#">219</a>	Substantive	<ul style="list-style-type: none"> <li>plant species is a host and seeds can be a pathway for entry but cannot lead to establishment <u>and spread</u> of the pest</li> </ul>	Addition of "and spread" to be consistent with the fundamental terms of pest risk analysis and IPPC.	South Africa
1047.	<a href="#">219</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is a host and seeds can be a pathway for entry but cannot lead to establishment of the pest</del></li> </ul>	Delete. See comment at [213].	Australia
1048.	<a href="#">219</a>	Technical	<ul style="list-style-type: none"> <li><del>plant species is a host and seeds can be a pathway for entry but cannot lead to establishment of the pest</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1049.	<a href="#">220</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) but cannot lead to establishment</del></li> </ul>	refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize
1050.	<a href="#">220</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) but cannot lead to establishment</del></li> </ul>	Delete paragraph 220 because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1051.	<a href="#">220</a>	Substantive	<ul style="list-style-type: none"> <li>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) but cannot lead to establishment <u>and spread</u></li> </ul>	Addition of “and spread” to be consistent with the fundamental terms of pest risk analysis and IPPC.	South Africa
1052.	<a href="#">220</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) but cannot lead to establishment</del></li> </ul>	Delete. See comment at [213].	Australia
1053.	<a href="#">220</a>	Technical	<ul style="list-style-type: none"> <li><del>plant species is not a host, but seeds can be a pathway for entry (contaminating pest) but cannot lead to establishment</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1054.	<a href="#">221</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, and seeds are not a pathway for entry.</del></li> </ul>	refer to comment in 213	Singapore, China, Korea, Republic of, Ghana, Belize
1055.	<a href="#">221</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, and seeds are not a pathway for entry.</del></li> </ul>	Delete paragraph 221 because paragraphs [214-221] are not specific to seeds and are all considerations of every PRA.	Canada
1056.	<a href="#">221</a>	Substantive	<ul style="list-style-type: none"> <li><del>plant species is not a host, and seeds are not a pathway for entry.</del></li> </ul>	Delete. See comment at [213].	Australia
1057.	<a href="#">221</a>	Technical	<ul style="list-style-type: none"> <li><del>plant species is not a host, and seeds are not a pathway for entry.</del></li> </ul>	See comment in paragraph 213	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1058.	<a href="#">222</a>	Editorial	PRA (see ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004) provides a <u>scientific</u> basis for determining the potential of seeds being a pest risk.	Addition of “scientific” the reason being that it provides greater clarity and focus on contextual clarification.	South Africa
1059.	<a href="#">222</a>	Substantive	<del>PRA (see ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004) provides a basis for determining the potential of seeds being a pest risk.</del>	refer to comment in 213.	Singapore, China, Korea, Republic of, Ghana, Belize

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1060.	222	Technical	 <p>PRA (see ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004) provides a basis for determining the potential of seeds being a pest risk.</p> <p><u>The decision tree below illustrates the possible outcomes when evaluating if seed is a pathway and if phytosanitary measures are required.</u></p>	NOTE: The system doesn't allow an image to be included in the comments. The image will be sent by email to IPPC Secretariat. The decision tree is a useful visualization of the sequence of questions to be addressed during the PRA process to determine the relevance of seeds as a pathway for the pest concerned and to determine whether the pest warrants phytosanitary measures when importing seeds into the PRA area.	ISF*
1061.	222	Technical	<del>PRA (see ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004) provides a basis for determining the potential of seeds being a pest risk.</del>	Redundant this was already mentioned in the core text in the specific section on PRA	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1062.	223	Substantive	<del>This annex is a prescriptive part of the standard</del>	There is no substantial need for this annex	NEPPO, Bahrain,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Morocco
1063.	223	Substantive	<del>This annex is a prescriptive part of the standard</del>	There are no mention for this annex in the draft standard	OIRSA
1064.	224	Substantive	<b>ANNEX 2: Forest tree seeds</b>	There is no text provided under this title and there is no referenece exist in the body of the draft ISPM to this proposed annex	NEPPO, Bahrain, Morocco
1065.	224	Substantive	<b>ANNEX 2: Forest tree seeds</b>	There are no mention for this annex in the draft standard	OIRSA
1066.	224	Substantive	<b>ANNEX 2: Forest tree seeds</b>	In the sense of establishing quarantine risk, whether the seed has come from a tree or other commodity is not relevant to a PRA. Therefore a forest tree seeds annex is not necessary.	Australia
1067.	227	Editorial	<b>APPENDIX 24: Bibliography</b>	Change due to additional appendix on pest groups.	Australia
1068.	228	Technical	The references included in this appendix are <u>freely available</u> <del>easily accessible</del> and generally recognized as authoritative. The list is neither comprehensive nor static.	References into the ISPMs should be available for everybody and free of cost	NEPPO, Bahrain, Morocco
1069.	229	Editorial	<b>Seeds as a pathway, and seed-borne and seed-transmitted diseases</b>	In line with other changes.	European Union
1070.	233	Technical	<del>Richardson, M.J. 1990. An annotated list of seed-borne diseases, 4th edn. Bassersdorf, Switzerland, International Seed Testing Association (ISTA). Available at <a href="http://www.seedtest.org/en/productdetail---0-0-0-32.html">http://www.seedtest.org/en/productdetail---0-0-0-32.html</a></del>	The list has not been updated since to take into account recent research and publications.	ISF*
1071.	234	Editorial	<u>ISTA (International Seed Testing Association)</u> <del>Note: Update of the International Seed Testing Association (ISTA)</del> “ <u>Annotated</u> List of seed-borne diseases” is in progress as part of the TESTA project on the basis of a full literature review with expert analysis of scientific papers. It will take the form of a database on the ISTA website ( <a href="http://services.prismanet.ch/SeedDiseasesDb">http://services.prismanet.ch/SeedDiseasesDb</a> ).	To align this wording with those for other references	EPPO, Georgia, Serbia
1072.	234	Editorial	<del>Note: Update of the</del> International Seed Testing Association (ISTA) “List of seed-borne diseases” is <del>in progress</del> <u>being updtated</u> as part of the TESTA project on the basis of a full literature review with expert analysis of scientific papers. It will take the form of a database on the ISTA website ( <a href="http://services.prismanet.ch/SeedDiseasesDb">http://services.prismanet.ch/SeedDiseasesDb</a> ).	more accurate	ISTA*
1073.	234	Editorial	<u>ISTA (International Seed Testing Association)</u> Note: Update of the International Seed Testing Association (ISTA) “ <u>Annotated</u> List of seed-borne diseases” is in progress as part of the TESTA project on the basis of a full literature review with expert analysis of scientific papers. It will take the form of a database on the ISTA website ( <a href="http://services.prismanet.ch/SeedDiseasesDb">http://services.prismanet.ch/SeedDiseasesDb</a> ).	To align this wording with those for other references	European Union

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1074.	234	Editorial	<del>Note:</del> Update of the International Seed Testing Association (ISTA) " <del>annotated list of seed borne diseases</del> ". Update of the " <del>L</del> " list of seed-borne diseases" is in progress as part of the TESTA project on the basis of a full literature review with expert analysis of scientific papers. It will take the form of a database on the ISTA website ( <a href="http://services.prismanet.ch/SeedDiseasesDb">http://services.prismanet.ch/SeedDiseasesDb</a> ).	Editorial and contextual clarification.	South Africa
1075.	234	Substantive	Note: Update of the International Seed Testing Association (ISTA) "List of seed-borne diseases" is in progress as part of the TESTA project on the basis of a full literature review with expert analysis of scientific papers. It will take the form of a database on the ISTA website ( <a href="http://services.prismanet.ch/SeedDiseasesDb">http://services.prismanet.ch/SeedDiseasesDb</a> ).	Regarding the URL: Comment: List is not yet updated and its use could create some confusion if some NPPO use it to define their requirements for phytosanitary certificates. So we propose to cancel it yet from the references, until a list is available	ISTA*
1076.	234	Technical	<del>Note: Update of the International Seed Testing Association (ISTA) "List of seed-borne diseases" is in progress as part of the TESTA project on the basis of a full literature review with expert analysis of scientific papers. It will take the form of a database on the ISTA website (<a href="http://services.prismanet.ch/SeedDiseasesDb">http://services.prismanet.ch/SeedDiseasesDb</a>).</del>	It is a note, it can not be considered as bibliography	New Caledonia*
1077.	234	Technical	<del>Note: Update of the International Seed Testing Association (ISTA) "List of seed-borne diseases" is in progress as part of the TESTA project on the basis of a full literature review with expert analysis of scientific papers. It will take the form of a database on the ISTA website (<a href="http://services.prismanet.ch/SeedDiseasesDb">http://services.prismanet.ch/SeedDiseasesDb</a>).</del>	The update has not been completed and the website doesn't exist.	ISF*
1078.	236	Editorial	<del>ISF</del> Note: An International Seed Federation (ISF) A pest list is available on the ISF website ( <a href="http://www.worldseed.org/isf/pest_lists.html">http://www.worldseed.org/isf/pest_lists.html</a> ).	To align the wording of this reference with those of others.	EPPO, Georgia, Serbia
1079.	236	Editorial	<del>Note: An</del> International Seed Federation (ISF) pest list is available on the ISF website ( <a href="http://www.worldseed.org/isf/pest_lists.html">http://www.worldseed.org/isf/pest_lists.html</a> ).	better description	ISTA*
1080.	236	Editorial	<del>ISF (International Seed Federation)</del> Note: An International Seed Federation (ISF) pest list is available on the ISF website ( <a href="http://www.worldseed.org/isf/pest_lists.html">http://www.worldseed.org/isf/pest_lists.html</a> ).	To align the wording of this reference with those of others.	European Union
1081.	236	Editorial	<del>Note: An</del> International Seed Federation (ISF) pest list is available on the ISF website ( <a href="http://www.worldseed.org/isf/pest_lists.html">http://www.worldseed.org/isf/pest_lists.html</a> ).	Deletion of "note" for editorial and contextual clarification.	South Africa
1082.	236	Technical	<del>Note: An International Seed Federation (ISF) pest list is available on the ISF website (<a href="http://www.worldseed.org/isf/pest_lists.html">http://www.worldseed.org/isf/pest_lists.html</a>).</del>	It could not be considered as bibliography	New Caledonia*
1083.	236	Technical	<del>Note: An International Seed Federation (ISF) pest list is available on the ISF website</del> <del>ISF (International Seed Federation). Pest List Database. Nyon, Switzerland, ISF. Available at (<a href="http://www.worldseed.org/isf/pest_lists.html">http://www.worldseed.org/isf/pest_lists.html</a>).</del> (accessed April 2014)	The correct citation to the pest lists has been provided.	ISF*
1084.	236	Technical	<del>Note: An International Seed Federation (ISF) pest list is available on the ISF website (<a href="http://www.worldseed.org/isf/pest_lists.html">http://www.worldseed.org/isf/pest_lists.html</a>).</del>	Not a legitimate bibliography source.	Australia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1085.	237	Technical	<b>Seed health testing and sampling protocols</b>	Tal vez podríamos dejar sólo los seed testing y eliminar las referencias a los PD. Con lo cual sólo habría que eliminar los párrafos 242, 246 y 247	Argentina
1086.	244	Editorial	<b>ISTA</b> (International Seed Testing Association). 2012. <i>International rules for seed testing. Seed health testing methods</i> . Bassersdorf, Switzerland, ISTA. Available at <a href="http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html">http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html</a> (accessed May 2014).	Not necessary to indicated the year as it is updated yearly on the website	ISTA*
1087.	244	Substantive	<b>ISTA</b> (International Seed Testing Association). 2014. <i>Full version of the International rules for seed testing. (ISTA Rules) Seed health testing methods</i> . Bassersdorf, Switzerland, ISTA. <a href="http://www.seedtest.org/en/inter-national-rules-content---1--1083.htm">Information on how to access a full copy of all chapters of the ISTA Rules at http://www.seedtest.org/en/inter-national-rules-content---1--1083.htm</a> Available at <a href="http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html">http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html</a> (accessed May 2014).  <a href="http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html">ISTA (International Seed Testing Association). 2014. ISTA Rules. Chapter 7: Seed health testing methods. Bassersdorf, Switzerland, ISTA. Free download available at http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html</a>  <a href="http://www.seedtest.org/en/downloads-content---1--1422.html">ISTA (International Seed Testing Association). 2014. ISTA Rules. Chapter 2: Sampling. Bassersdorf, Switzerland, ISTA. Free download available at http://www.seedtest.org/en/downloads-content---1--1422.html</a>	Update the reference to ISTA (ISTA Rules) and add additional relevant ISTA references.	Canada
1088.	244	Substantive	<b>ISTA</b> (International Seed Testing Association). 2012. <i>International rules for seed testing. Seed health testing methods</i> . Bassersdorf, Switzerland, ISTA. Available at <a href="http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html">http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html</a> (accessed May 2014).  <a href="http://www.seedtest.org/upload/user/ISTA_2014_02_sampling1.pdf">ISTA (International Seed Testing Association) International rules for seed testing , 2014, Chapter 2: Sampling. Available at http://www.seedtest.org/upload/user/ISTA_2014_02_sampling1.pdf</a> (accessed July 2014)	Addition of the paragraph. ISTA rules are specific for seeds and provide excellent additional information on best sampling practices in addition to ISPM 31: 2009	South Africa
1089.	244	Technical	<b>ISTA</b> (International Seed Testing Association). 2012. <i>International rules for seed testing. Seed health testing methods</i> . Bassersdorf, Switzerland, ISTA. Available at <a href="http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html">http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html</a>	ISTA rules are specific for seeds and provide excellent additional information on best sampling practices in addition to ISPM 31: 2009.	ISF*

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<a href="#">content---1--1132--746.html</a> (accessed May 2014).  <a href="#">ISTA (International Seed Testing Association) International rules for seed testing, 2014, Chapter 2: Sampling. Available at: http://www.seedtest.org/upload/cms/user/ISTA_Rules_2014_02_sampling1.pdf (accessed July 2014)</a>		
1090.	244	Technical	<b>ISTA</b> (International Seed Testing Association). 2012. <i>International rules for seed testing. Seed health testing methods</i> . Bassersdorf, Switzerland, ISTA. Available at <a href="http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html">http://www.seedtest.org/en/download-ista-seed-health-testing-methods-content---1--1132--746.html</a> (accessed May 2014).  <a href="#">ISTA (International Seed Testing Association). 2014. International rules for seed testing, 2014. Chapter 2: Sampling. Available at http://www.seedtest.org/upload/cms/user/ISTA_Rules_2014_02_sampling1.pdf (accessed July 2014).</a>	Additional relevant reference.	European Union
1091.	252	Substantive	<del>This appendix is for reference purposes only and is not a prescriptive part of the standard.</del>	No value add to the draft & hence propose to delete this appendix.	Singapore, China, Korea, Republic of, Ghana, Belize
1092.	252	Substantive	<del>This appendix is for reference purposes only and is not a prescriptive part of the standard.</del>	No substantial need for this paragraph	NEPPO, Bahrain, Morocco
1093.	252	Technical	<del>This appendix is for reference purposes only and is not a prescriptive part of the standard.</del>	We are proposing to include the concepts of Appendix 2 in New section 1.3.3 "Seed Treatments"	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1094.	253	Editorial	<b>APPENDIX 2: <u>Treatment types for</u>General classification of seeds treatments</b>	Better wording, reflecting the contents.	EPPO, Georgia, European Union, Serbia
1095.	253	Substantive	<b>APPENDIX 2: General classification of seed treatments</b>	No value add to the draft - propose to delete the entire appendix 2.	Singapore, China, Korea, Republic of, Ghana, Belize
1096.	253	Substantive	<b>APPENDIX 2: General classification of seed treatments</b>  <u>The whole appendix to be removed</u>	No need for the appendix, because the information in the appendix are not relevant	NEPPO, Bahrain, Morocco

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1097.	253	Substantive	<b>APPENDIX 2: General classification of seed treatments</b>	Delete this appendix. This information is brief, very general and does not really add any phytosanitary guidance for seed.	Australia
1098.	253	Technical	<b>APPENDIX 2: General classification of seed treatments</b>	We are proposing to include the concepts of this appendix in New section 1.3.3 "Seed Treatments"	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1099.	254	Substantive	<b>1. Pesticides</b>	Refer to comment in 253	Singapore, China, Korea, Republic of, Ghana, Belize
1100.	254	Substantive	<b>1. Pesticides</b>	Delete	Australia
1101.	254	Technical	<b>1. Pesticides</b>	We are proposing to include the concepts of this appendix in New section 1.3.3 "Seed Treatments"	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1102.	255	Substantive	<del>Pesticides are generally used against fungi and insect pests and occasionally against bacteria and nematodes. The use of pesticides as seed treatment is regulated by national legislation and therefore authorization, formulations and concentration differ among countries and may also change over time.</del>	refer to comment in 253.	Singapore, China, Korea, Republic of, Ghana, Belize
1103.	255	Substantive	<del>Pesticides are generally used against fungi and insect pests and occasionally against bacteria and nematodes. The use of pesticides as seed treatment is regulated by national legislation and therefore authorization, formulations and concentration differ among countries and may also change over time.</del>	Delete	Australia
1104.	255	Technical	Pesticides are generally used against fungi and insect pests and occasionally against bacteria and nematodes. The use <u>and acceptance</u> of pesticides as seed treatment is regulated by national legislation <u>of both exporting and importing countries</u> and <del>therefore</del> authorization, formulations and concentration <u>often</u> differ <u>widely</u> among countries and may also change over time.	Better expressed the situation	EPPO, Georgia, European Union, Norway, Serbia
1105.	255	Technical	<del>Pesticides are generally used against fungi and insect pests and occasionally against bacteria and nematodes. The use of pesticides as seed treatment is regulated by national legislation and therefore authorization, formulations and concentration differ among countries and may also change over time.</del>	See comment in paragraph 253	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1106.	256	Substantive	<b>2. Disinfectants</b>	refer to comment in 253	Singapore, China, Korea, Republic of,



Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
					Ghana, Belize
1107.	256	Substantive	<del>2. Disinfectants</del>	Delete	Australia
1108.	256	Technical	<del>2. Disinfectants</del>	See comments in paragraph 253	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1109.	257	Editorial	Disinfectants are generally used against bacteria and viruses. Disinfection may take place during various steps in seed processing (e.g. seed extraction, seed priming <sup>1</sup> or during a dedicated disinfection process). Seed disinfection can eradicate or inactivate micro-organism infestation and infection, depending on the process and the biocide applied.	It is lacking a bracket.	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1110.	257	Substantive	<del>Disinfectants are generally used against bacteria and viruses. Disinfection may take place during various steps in seed processing (e.g. seed extraction, seed priming<sup>1</sup> or during a dedicated disinfection process. Seed disinfection can eradicate or inactivate micro-organism infestation and infection, depending on the process and the biocide applied.</del>	refer to comment in 253	Singapore, China, Korea, Republic of, Ghana, Belize
1111.	257	Substantive	<del>For surface disinfection, D</del> disinfectants are generally used against bacteria and <del>fungi</del> viruses. Disinfection may take place during various steps in seed processing (e.g. seed extraction, seed priming <sup>1</sup> or during a dedicated disinfection process. Seed disinfection can eradicate or inactivate micro-organism infestation and infection, depending on the process and the biocide applied.	Add text at the beginning of the first sentence for clarity. Delete "viruses" and add "fungi" since surface disinfection is more often used for fungi than viruses.	Canada
1112.	257	Substantive	<del>Disinfectants are generally used against bacteria and viruses. Disinfection may take place during various steps in seed processing (e.g. seed extraction, seed priming<sup>1</sup> or during a dedicated disinfection process. Seed disinfection can eradicate or inactivate micro-organism infestation and infection, depending on the process and the biocide applied.</del>	Delete	Australia
1113.	257	Technical	<del>Disinfectants are generally used against bacteria and viruses. Disinfection may take place during various steps in seed processing (e.g. seed extraction, seed priming<sup>1</sup> or during a dedicated disinfection process. Seed disinfection can eradicate or inactivate micro-organism infestation and infection, depending on the process and the biocide applied.</del>	See comment in paragraph 253	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1114.	258	Substantive	<del>3. Physical treatments</del>	refer to comment in 253.	Singapore, China, Korea, Republic of, Ghana, Belize

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1115.	258	Substantive	<del>3. Physical treatments</del>	Delete	Australia
1116.	258	Technical	<del>3. Physical treatments</del>	See comment in paragraph 253	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1117.	259	Editorial	Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments <del>may be are</del> used to control bacteria, viruses, fungi and nematodes.	Better wording	EPPO, Georgia, European Union, Serbia
1118.	259	Substantive	<del>Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, fungi and nematodes.</del>	refer to comment in 253	Singapore, China, Korea, Republic of, Ghana, Belize
1119.	259	Substantive	Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, <u>phytoplasmas</u> , fungi and nematodes. <u>Seed cleaning can be used to remove plants as pests and other regulated articles.</u>	1. Add phytoplasmas to the list affected by physical treatments. 3. Add a new sentence to add seed cleaning as an effective physical treatment.	Canada
1120.	259	Substantive	Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, fungi, <u>insect pests</u> and nematodes.	Physical treatment is effective against insect pests.	Japan
1121.	259	Substantive	Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, fungi and nematodes.  <u>Seed cleaning, conditioning and sorting are used to remove soil, plant debris, infected or suspicious seeds, weed seeds and insects.</u>	Addition of a new sentence because seed cleaning, conditioning and sorting are also physical treatments routinely used by the seed industry during harvest and post-harvest as risk mitigation measures.	South Africa
1122.	259	Substantive	<del>Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, fungi and nematodes.</del>	Delete	Australia
1123.	259	Technical	Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, fungi, <u>insects</u> and nematodes.	Include also insects.	EPPO, Georgia, European Union, Norway, Serbia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
1124.	259	Technical	Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, fungi and nematodes.  <u>Seed cleaning, conditioning and sorting are used to remove soil, plant debris, infected or suspicious seeds, weed seeds and insects.</u>	Seed cleaning, conditioning and sorting are also physical treatments routinely used by the seed industry during harvest and post-harvest as risk mitigation measures.	ISF*
1125.	259	Technical	<del>Dry heat, steam, hot water, irradiation, (ultraviolet) light, high pressure, deep-freezing and other physical treatments are used to control bacteria, viruses, fungi and nematodes.</del>	See comment in paragraph 253	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1126.	260	Substantive	<del>4. Biological treatments</del>	refer to comment in 253	Singapore, China, Korea, Republic of, Ghana, Belize
1127.	260	Substantive	<del>4. Biological treatments</del>	Delete	Australia
1128.	260	Technical	<del>4. Biological treatments</del>	See comment in paragraph 253	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1129.	261	Editorial	Biological treatments are based on different modes of action, such as antagonism, competition and induced resistance. The pest may actually be <u>present</u> on the seeds at the time of planting but <u>pest</u> establishment is not possible or strongly reduced when the biological <u>agent treatment</u> is activated during germination. Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant.	Better wording	EPPO, Georgia, Serbia
1130.	261	Editorial	Biological treatments are based on different modes of action, such as antagonism, competition and induced resistance. The pest may actually be <u>present</u> on the seeds at the time of planting but <u>pest</u> establishment is <del>not possible or</del> strongly reduced when the biological <u>agent treatment</u> is activated during germination. Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant.	Better wording	European Union
1131.	261	Substantive	Biological treatments are based on different modes of action, such as antagonism, competition and induced resistance. The pest may actually be on the seed at the time of planting but establishment is not possible or strongly reduced when the biological treatment is activated during germination <u>where</u>	For such susceptible material it may not be always acceptable to use biological treatment if establishment of pest is only reduced.	Latvia

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<u>acceptable</u> . Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant.		
1132.	<a href="#">261</a>	Substantive	<del>Biological treatments are based on different modes of action, such as antagonism, competition and induced resistance. The pest may actually be on the seed at the time of planting but establishment is not possible or strongly reduced when the biological treatment is activated during germination. Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant.</del>	refer to comment in 253	Singapore, China, Korea, Republic of, Ghana, Belize
1133.	<a href="#">261</a>	Substantive	Biological treatments are based on different modes of action, such as antagonism, competition and induced resistance. The pest may actually be on the seed at the time of planting but establishment is not possible or strongly reduced when the biological treatment is activated during germination. Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant. <u>Some of examples of biological treatments are example 1 and example 2.</u>	Some examples of biological treatments should be given to add further clarity for NPPOs.	Saint Kitts And Nevis
1134.	<a href="#">261</a>	Substantive	Biological treatments are based on different modes of action, such as antagonism, competition and induced <del>tolerance</del> resistance. The pest may actually be on the seed at the time of planting but establishment is not possible or strongly reduced when the biological treatment is activated during germination. Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant.	Global change from "resistance" to "tolerance" as per comment made in para 77.	Canada
1135.	<a href="#">261</a>	Substantive	<del>Biological treatments are based on different modes of action, such as antagonism, competition and induced resistance. The pest may actually be on the seed at the time of planting but establishment is not possible or strongly reduced when the biological treatment is activated during germination. Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant.</del>	Delete	Australia
1136.	<a href="#">261</a>	Technical	<del>Biological treatments are based on different modes of action, such as antagonism, competition and induced resistance. The pest may actually be on the seed at the time of planting but establishment is not possible or strongly reduced when the biological treatment is activated during germination. Biological treatments may also be used against soil-borne pests (e.g. nematodes) to create a space free from pests around the germinating seed and the root zone of the plant.</del>	See comment in paragraph 253	COSAVE, Brazil, Uruguay, Chile, Peru, Argentina
1137.	<a href="#">262</a>	Editorial	<b>Footnote 1:</b> Seed priming is the pre-treatment of seeds by various methods in order to improve the <del>seed germination</del> rate, the percentage <del>of germination</del> and	Clearer wording	EPPO, Georgia,

Com m. no.	Para . no.	Comment type	Comment	Explanation	Country
			<del>the</del> uniformity of <u>germination</u> <del>seedling emergence</del> .		European Union, Serbia
1138.	262	Substantive	<del>Footnote 1: Seed priming is the pre-treatment of seeds by various methods in order to improve the seed germination rate, the percentage of germination and the uniformity of seedling emergence.</del>	refer to comment in 253	Singapore, China, Korea, Republic of, Ghana, Belize
1139.	262	Substantive	<del>Footnote 1: Seed priming is the pre-treatment of seeds by various methods in order to improve the seed germination rate, the percentage of germination and the uniformity of seedling emergence.</del>	Delete	Australia