

United States Country Comments

Integrated Measures for Pest Risk Management Systems Approaches

10/29/01

General: The United States generally accepts this standard, however, for the sake of clarity please consider the comments below.

Specific Comments:

TITLE

Comment – Change title to read, “Systems Approaches for Pest Risk Management”. The term “Systems Approaches” should be the primary focus of the title.

DEFINITIONS AND ABBREVIATIONS

Comment – For “Control point”, change to read, “A step in a system where specific procedures can be applied to achieve an effect and these procedures can be measured, monitored, controlled or corrected.” We used “or” since you may not be able to do all of these in all cases.

Comment – For “Systems approach(es)”, change sentence to read, “The integration of differentindependently, and which can cumulatively achieve the desired level of phytosanitary protection.” Add the word “can” since the measures may not be successful.

Comment – For “Test”, we would like to see this definition changed. The phrase “other than visual” does not account for microscopic examination. We suggest, “Any means, other than visual examination by the unaided eye, to identify a pest or to determine whether a pest is present in a commodity or consignment.”

OUTLINE OF REQUIREMENTS

We suggest some rearranging and modification of the text for clarity purposes.

Comment – change section to read:

“System approaches are integrated measures for pest risk management. Systems approaches are alternatives to single measures to achieve a level of phytosanitary protection established by an importing country. Systems approaches vary in complexity, however, they all require the integration of different measures, at least two of which act

independently, with a cumulative effect. Options for measures may be selected from a range of pre- and post-harvest measures and include measures to compensate for uncertainty.

The application of a critical control point system may be useful to identify and evaluate points in a production system pathway where pest risks can be reduced and monitored.

The decision regarding the acceptability of a systems approach lies with the importing country. Ideally, exporting and importing countries should consult and cooperate in the development and implementation of a systems approach system.”

REQUIREMENTS

Comment – In 1., move the first sentence of the second paragraph after the first sentence in the first paragraph. This seems to make the thought of the sentence more complete.

Comment – Change the third sentence in the first paragraph to read, “They afford an opportunity to consider

Comment – In the second sentence of the second paragraph drop the end of the sentence beginning with “to provide the desired level of protection and confidence” and replace it with “to be applied”.

Comment – In 2., drop the last sentence of the second paragraph beginning with, “Systems approaches may require.....” It is unclear as to meaning and too negative, since system approaches are suppose to reduce uncertainty not increase it.

Comment – In 2., Under the heading “Pre-harvest;

Move the bullet “harvesting plants at a specific stage of development or time of year” to the heading “Harvest”.

After “cultural controls” add, “/sanitation/weed control”.

After “pest free areas, places or sites of production “ and Low pest prevalence (continuous or at a specific time)”, add, “as demonstrated by survey/monitoring”.

Under “testing”, we question if this should be a stand-alone option, since testing is usually associated with some of the options previously mentioned.

Comment – Under the heading “Post harvest treatment and handling”, add another bullet, “screening of packing houses and storage areas”. Also, is “testing” need here?

Comment – In 3., we believe the wording of the second sentence is misleading and the example confusing. We suggest the following, “A systems approach may be composed of independent and dependent measures. By definition it needs to have at least two

independent measures. Dependent measures, taken as a whole, can be considered to be an independent measure.

Example:

If the safeguards are independent of each other both safeguards must fail for the system to fail. With independent safeguards the probability of failure is the product of all the safeguards. For example, if the inspection of the shipment has a 5 percent probability of failure and the limiting of the shipment to certain areas also has a 5 percent chance of failure then the probability of the system failing would be .25 percent (.05 x .05). Independent safeguards are said to be redundant since all of these need to fail for the system to fail.”

A dependent measure requires supporting measures to be effective. An example of dependent safeguards is a pest free greenhouse. Both a double-door requirement and screening of all openings are dependent safeguards. To be effective you need both, even though each reduces the risk of the greenhouse becoming infested. The probability of failure is additive with dependent safeguards. For example, if the probability that the screening fails (pest enter through holes) is 10 percent and the probability that the double-doors fail to exclude the pest is 10 percent, then the probability of the greenhouse being infested is the approximate sum of the two values. In this example it has a 20 percent probability (.10 + .10) of failure since both of these safeguards could fail at the same time.

Comment – In 5. Types of Systems Approaches, we believe we should down-play the reference to HACCP. To this end we make the following recommended changes.

“Systems approaches range in complexity and rigor from systems that simply combine independent measures known to be effective to more complex and precise systems such as a Critical Control Point System (CCPS). An example of this type of system is practiced in food safety and is termed a Hazard Analysis Critical Control Point system. A typical CCPS would follow the following procedures:

1. thru 6 . as enumerated in standard.

The application of a CCPS for phytosanitary purposes may be useful to identify and evaluate hazards and the points in a pathway where risks can be reduced, monitored and adjustments made where necessary. The use of a CCPS for phytosanitary purposes does not imply or prescribe that application of controls is necessary to all control points.

Comment - In 5.1 and 5.2, eliminate all references to HACCP systems. In 5.2, in the second bulleted item, delete “a known level of “. “Has efficacy” is sufficient.

Comment – In 5.2., change the wording in the last bullet from “overseen” to “monitor”.

Comment – In 5.2., we suggest the following rewrite of the paragraph, “Other systems based on a combination of measures that do not meet the requirements for formal CCPSs

may be considered effective. For example, quality certification programs may have elements that also are valuable as risk management measures and may be included in a systems approach provided the phytosanitary elements of the process are mandatory and are monitored and controlled by the NPPO.”

Comment – In 6., second paragraph, third sentence, delete beginning and change to read, “Where quantitative data are available this can be expressed.....”.

Comment – In 7., second paragraph, first sentence, add to the end “with the systems approach”. This makes it clearer where the lack of experience is located.

Comment – In 8., change the last sentence to read, “When a systems approach is found unacceptable, the rationale for this decision should be detailed to facilitate the identification of improvements.”

Comment – In 9.1, delete “Other responsibilities of the exporting country include:” and replace with, “Post-implementation responsibilities of the importing country may include:”. This makes it clear that these bullets have to do with checking the system to make sure the goals are being met.

Comment – In 9.2, Change to read, “This may include:”. Change the wording, “Other responsibilities of the importing country may include:” to “Post implementation responsibilities of the importing country may include:”.