

Template for comments - Draft ISPMs for country consultation, 2008

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

See [instructions](#) on how to use this template at the end of the document. Following these will greatly facilitate the compilation of comments and the work of the Standards Committee.

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
<i>GENERAL COMMENTS</i>			Substantive	This draft should not be a supplement for an ISPM; it should be a <u>non-binding reference document</u> available to all member countries in the IPP.	It is not appropriate to include CBD terminology in the Glossary of Phytosanitary Terms. The CBD terms included in this document were not fully adopted by consensus by the Conference of the Parties (COP). Furthermore, the CBD terms were poorly defined in the Guiding Principles making their use for operational purposes difficult and confusing. The ICPM in 2001 agreed that IPPC terms like quarantine pest and pest risk analysis, adequately incorporate concepts related to invasive species and related concepts addressed in the CBD Guiding Principles. While it is appropriate that there be some sort of reference document providing interpretation of CBD terms into IPPC terms, it should not be made into a legally binding standard. At most, this document should serve as a reference document but have no official status. Further, we suggest that the document be reformatted to make it easier to compare terms side by side. Formulate as a table, including columns for “CBD terms”, “Explanation in IPPC terms”, “Explanatory Notes”, and “Related IPPC terms”. See example at the end of format.	USA
<i>SPECIFIC COMMENTS</i>						
TITLE	[1]					
1. Introduction	[2]					
1. Introduction	[3]	1st sentence	Editorial/technical	Since 2001, the IPPC has undertaken initiatives to address the protection of the		USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
		2nd sentence	editorial	<p>environment and of biological diversity in relation to the introduction and spread of non-indigenous species <u>of plant pests.</u></p> <p><u>Revisions to ISPM No.11 on pest risk analysis for quarantine pests has highlighted specific aspects of risk analysis arising from pests...</u></p>		
		3rd sentence	editorial	<p>Supplement No.2 of ISPM No.5 (<i>Glossary of phytosanitary terms</i>) <u>explains</u> in detail how...</p>		
		4th sentence	technical	<p><u>This clarification of the scope of the IPPC and the role of PRA is now understood and accepted by contracting parties.</u></p>		
1. Introduction	[4]	5th row to the end	technical	<p><u>However, there continue to be differences in the terminology adopted by the IPPC and the Convention on Biological Diversity (CBD) for similar concepts. Terms specific to each organization may be confused or conflict with identical or similar terms in the other organization – potentially leading to conflicting obligations for member countries. As such, it is necessary to clarify the relationship of relevant terms and how they are applied in specific circumstances according to either agreement. The CBD uses a number of such terms and definitions in the framework of its “guiding principles for the prevention, introduction and mitigation of impacts of alien species that threaten ecosystems, habitats or species” (hereafter “CBD Guiding Principles”).</u></p> <p><u>Attempts to harmonize terminology between the CBD and IPPC have proved unsuccessful because of significant differences in the description of concepts and different terms applied to the same concepts. For example, the CBD is concerned only with species that are moved by human agency, and its terminology</u></p>		USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				refers only to those species (“alien species”) which have already been moved into an area where they are non-indigenous. This is referred to as “introduction”, which accordingly does not include “establishment” (as it does for the IPPC). <u>Such disparities make it impossible to include fundamental CBD terms and definitions directly in the IPPC Glossary or other ISPMs. The present document is therefore not designed to harmonize terminology but rather to highlight and explain the differences as a means to help countries better understand and implement their obligations under both agreements.</u>		
2. Presentation	[5]					
2. Presentation	[6]	1st sentence	Editorial	<u>For each listed term, the CBD definition is provided first.</u>		USA
		Last sentence	technical	delete	Unnecessary`	
3. Terminology	[7]					
3.1 Alien species	[8]					
3.1 Alien species	[9]					
3.1 Alien species	[10]					
3.1 Alien species: Notes	[11]					
3.1 Alien species: Note 1	[12]	Whole para	Technical	<u>Alien only refers to the location and distribution of an organism compared to its natural range. It does not imply that the organism is harmful. In IPPC terminology this is non-indigenous.</u> The word “past” in the CBD definition presumably allows for the reintroduction of a species into an area where it has (recently) become extinct. Conservationists would not wish such a species to be considered alien. “Recently” is bracketed, because it is not stated explicitly; presumably, “ancient” extinctions, as attested by fossils, would not qualify.		USA
3.1 Alien species: Note 2	[13]	Whole para	Technical	delete		USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.1 Alien species: Note 3	[14]	Whole para	Technical	For CBD purposes, an alien <u>species is present in the area that is not within its native distribution</u> (see Introduction below). <u>Because of the emphasis on preventing the introduction of harmful non-indigenous species (pests), the IPPC is more concerned with organisms that are not yet present in the area of concern (i.e. quarantine pests).</u> Terms such as “non-indigenous” or “non-native” <u>are used in ISPMs. They can be considered to be synonymous to “alien”.</u> The terms <u>“quarantine pest” and “non-indigenous” are more appropriate to use in PRA because it is important to distinguish organisms that are pests and may justify regulatory actions from those that are simply organisms outside their native range.</u> “Exotic “ <u>is not suitable because it does not translate well into other languages.</u>		USA
3.1 Alien species: Note 4	[15]	Whole para	Technical	A species that is non-indigenous and has entered an area through natural means it not an alien species (CBD). It is simply extending its natural range. For IPPC purposes, such a species could still be considered a potential quarantine pest <u>although it would be unlikely that measures for its control would be justified.</u>		USA
3.2 Introduction	[16]					
3.2 Introduction	[17]					
3.2 Introduction	[18]					
3.2 Introduction: Notes	[19]					
3.2 Introduction: Note 5	[20]	Last sentence	Technical	However, it may be supposed from the text of many of the CBD Guiding Principles that this is not so, and that a non-indigenous species is <u>only introduced (CBD) when it first enters and establishes.</u>		USA
3.2 Introduction: Note 6	[21]	Whole para	Technical	The issue of “areas beyond national jurisdiction” is not relevant for the IPPC <u>except to the extent that it applies to NPPO</u>		USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				<u>authority. The concept of pests in the IPPC is rather related to “areas”.</u>		
3.2 Introduction: Note 7	[22]	Whole para	Technical	In the case of indirect movement, it is not specifically stated in the definition whether all the movements from one area to another must be introductions (CBD) (i.e. by human agency, intentional or unintentional), or whether some can be by natural <u>movement</u>. This questions arises, for example, where a species is introduced (CBD) into one area and then <u>moves</u> naturally to an adjoining area. It seems that this may be considered as an indirect introduction (CBD) in the adjoining area, despite the fact that it entered it naturally. In the IPPC context, the intermediate country, from which the natural <u>movement</u> occurs, has no obligation to act to limit the natural <u>movement</u>, though it may have obligation to prevent intentional or unintentional introduction (CBD) if the importing country concerned establishes corresponding phytosanitary measures.	Do not agree with use of the term “spread” here because spread (in the IPPC) refers to expansion of distribution of a pest within an area, not between areas, or from one area to another. Therefore, it is not appropriate to refer to spread.	USA
3.3 Invasive alien species	[23]					
3.3 Invasive alien species	[24]					
3.3 Invasive alien species	[25]					
3.3 Invasive alien species: Notes	[26]					
3.3 Invasive alien species: Note 8	[27]	3rd sentence	Technical	ISPM No.11 (<i>Pest risk analysis for quarantine pests, including analysis of environmental risks and living modified organisms</i>) clarifies that quarantine pests may directly affect plants or indirectly in case of environmental risks via other components of ecosystems <u>such as biodiversity</u>.		USA
3.3 Invasive alien species: Note 9	[28]					
3.3 Invasive alien species: Note 10	[29]	2nd sentence	Technical	<u>But the term “invasive” has been interpreted such that it is used in connection with alien species.</u>		USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.3 Invasive alien species: Note 11	[30]	Last sentence	Technical	The threat to biological diversity is <u>understood to be covered</u>.		USA
3.3 Invasive alien species: Note 12	[31]	Add new sentence	Technical	<u>For IPPC purposes, invasiveness is only one aspect of the potential harmfulness associated with a pest. There will be pests which are a greater or lesser threat, or with greater or lesser consequences, or easier or harder to control, etc. These are all factors in characterizing the risk. Therefore “invasiveness” is a subset of the criteria used in the IPPC framework for risk analysis associated with the concept of a pest rather than a conceptual entity in itself.</u>		USA
3.4 Establishment	[32]					
3.4 Establishment	[33]					
3.4 Establishment	[34]					
3.4 Establishment: Notes	[35]					
3.4 Establishment: Note 13	[36]					
3.4 Establishment: Note 14	[37]					
3.4 Establishment: Note 15	[38]	Whole sentence	Technical	For CBD, the survival in an entirely man-managed situation is not establishment (CBD) because this is not “in a habitat”	Even the so called “natural habitats” may be considered to be man-managed– e.g. national or regional parks, etc. Therefore, the CBD term is restricted to only entirely natural areas. This implies the CBD is not concerned with invasive alien species that “establish” (CBD) in new areas. Seems very confusing.	USA
3.5 Intentional introduction	[39]					
3.5 Intentional introduction	[40]					
3.5 Intentional introduction	[41]					
3.6 Unintentional introduction	[42]					
3.6 Unintentional introduction	[43]					
3.6 Unintentional introduction	[44]	Whole para	Technical	Unintentional introduction (CBD) is <u>unregulated entry of a non-indigenous species via any pathway into an area.</u>		USA
3.6 Unintentional introduction: Notes	[45]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.6 Unintentional introduction: Note 16	[46]					
3.7 Risk analysis	[47]					
3.7 Risk analysis	[48]					
3.7 Risk analysis	[49]	Whole para	Technical		Is it only spread within an area, or does it also include the introduction of a new organism from one place to another?	USA
3.7 Risk analysis: Notes	[50]					
3.7 Risk analysis: Note 17	[51]	Whole sentence	Technical	It is noted that all kinds of consequences may be considered.	All kind of consequences needs more explanation.	USA
3.7 Risk analysis: Note 18	[52]	Add sentence at the end	Technical	<u>Furthermore, at the time the Guiding Principles were adopted in the COP6, the COP failed to reach consensus on this point (see UNEP/CBD/COP/6/20, pars. 294-324), due to concerns that the definition for risk analysis provided in the Guiding Principles could in fact create conflicting obligations for member countries. Therefore, the IPPC definition for PRA remains the most appropriate term to be used in ISPMs and in relation to phytosanitary issues.</u>		USA
3.7 Risk analysis: Note 19	[53]					
3.7 Risk analysis: Note 20	[54]	Whole para	Technical	delete		USA
4. Other Concepts	[55]					
4. Other Concepts	[56]	1st sentence	Technical	The CBD Guiding Principles do not define other concepts, but they do use a number of terms that <u>are specifically defined in the IPPC, understood differently,</u> or are not given a specific meaning under the IPPC		USA
5. Reference	[57]					
5. Reference	[58]					

Term	CBD Definition	IPPC Explanation	Explanatory notes	Applicable IPPC Term
Establishment	the process ¹³ of an alien species in a new habitat successfully producing viable offspring ¹⁴ with the likelihood of continued survival	establishment [CBD] is the establishment , by successful reproduction, of an alien species [CBD] in a habitat ¹⁵ in the area that it has entered .	<p>¹³ Establishment [CBD] is a process, not a result. It seems that a single generation of reproduction can be establishment [CBD], provided the offspring have a likelihood of continued survival (otherwise there would be a comma after "offspring"). The IPPC concept of "perpetuation for the foreseeable future" is not clearly expressed.</p> <p>¹⁴ "Offspring" is not clearly understood. In ordinary English, it implies new individuals. In the definition, it is not clear how far it applies to organisms that propagate themselves vegetatively, so that the concept of an "individual" is not always easy to recognize (many plants, most fungi, other microorganisms). By using "perpetuation", the IPPC avoids the question of reproduction or replication of individuals altogether. It is the species as a whole that survives. Even the growth of long-lived individuals to maturity could be considered to be perpetuation for the foreseeable future (e.g. plantations of a non-indigenous plant).</p> <p>¹⁵ Survival in an entirely man-managed situation is not establishment [CBD] because this is not "in a habitat".</p>	Establishment; also potentially incursion

INSTRUCTIONS FOR THE USE OF THE TEMPLATE

A template is provided to facilitate the submission and compilation of member comments. Paragraph numbers have been included in the draft standards, and each paragraph has a corresponding row in the template. It is important to be accurate in allocating comments to paragraphs, since the compilation of comments will be done automatically and only based on paragraph numbers.

To facilitate compilation of comments and the work of the Standards Committee, please apply the following and refer to the table of examples below:

- do not add or delete columns, and do not change their width
- ensure that all comments refer to the appropriate section of the text and paragraph number
- if proposals are made to add, delete or move paragraphs, subsequent comments should continue to refer to the paragraph numbers used in the draft standard sent for consultation
- when making several comments on the same paragraph, assign a number to each comment in the location, type of comment and explanation columns. Do not use automatic numbering.
- ensure that all cells of the row are completed when a comment is made
- use formatting to indicate proposed additions (e.g. underline) and deletions (e.g. ~~strikethrough~~), with colour as appropriate (e.g. red or blue) and not tracked changes
- only include enough text from the draft standard to display the suggested modifications. Do not include paragraphs or sentences for which no modifications are suggested
- delete the rows in which no comments are made.

Specific guidelines for each column in the template and examples of comments

1. Section

- This gives the titles of sections as they appear in the draft, plus rows for general and specific comments. To propose changes to section titles, include new wording in the "proposed rewording" column.
- General comments apply to the entirety of the standard. Specific comments apply to a defined section of the draft, which should be clearly identified.

2. Paragraph number (Paragraph)

- To propose a new paragraph, add a row and qualify the paragraph number with a letter (e.g. 12a, to indicate that the new paragraph follows paragraph 12).
- To propose to move a paragraph, indicate the new location in the "proposed rewording" column (e.g. move para 51 to after para 47). Do not alter the paragraph numbers.

3. Sentence/row/indent, etc.

- Clearly identify the specific place in the paragraph, such as sentence, row of a table, indent, etc, where the comment applies (e.g. sentence 2, indent 5, row 2, footnote 3, figure 15, etc). Table rows have been numbered in the drafts where possible. If bullets, indents or rows in a table are not numbered, they should be counted and the number indicated in this column.
- The text as circulated for consultation should be used as a basis for counting sentences, bullet points, etc. Please do not refer to page or line numbers as these may vary depending on the word processor used or language version of the draft.

4. Type of comment

Indicate whether the comment refers to a technical, substantive, editorial, or translation issue:

- technical comments change the technical content of the text. This includes scientific corrections, technical adjustments, etc.
- substantive comments change the meaning or intention of the text. This includes conceptual changes, addition of new aspects or ideas, etc.
- editorial comments clarify or simplify the text without changing the meaning. This includes spelling or grammatical corrections, suggestions of different but equivalent words, and simplification of sentence structure.
- translation comments correct points that are considered to be inaccurately translated into another language version of the text.

5. Proposed rewording

Suggestions to change the text should always include proposed rewording. Modifications to the original text should be clearly identifiable (i.e. text that is added or deleted should appear in a distinct way from unchanged text). For example, text added can be underlined and text deleted can be ~~striked through~~ (with colours as appropriate). Tracked changes should not be used.

6. Explanation

Detailed explanations should give justification for the comment made and should be sufficient for the Standard Committee to understand the intention of the comment and the proposed rewording.

7. Country

- There should be only one name in this column.
- The country name should be indicated in every row for which a comment is made. The country name should be that of the country submitting the comments.
- Comments made on behalf of an organization (such as an RPPO) should include only the organization name, and not the names of the member countries.

Examples of comments using the template

1. Section	2. Para nber	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
BACKGROUND	[9]	1. Sentence 1 2. Sentence 2	1. Substantive 2. Technical	The main purpose of the IPPC is to protect plants <u>secure common and effective actions to prevent the spread and introduction of pests of plants and plant products.</u> In doing so, contracting parties undertake the promotion of appropriate measures for the control of <u>regulated</u> pests.	1. To be consistent with the text of the IPPC. 2. The scope of the IPPC addresses regulated pests.	COUNTRY NAME
BACKGROUND	[17]	Sentence 4	Editorial	Thus <u>Additionally</u> , while pursuing the	Clearer wording	COUNTRY NAME
1.4 Supervision activities	[26]	Sentence 3	Substantive	The FF-ALPP programme, including regulatory control <u>domestic regulation</u>	The term regulatory control is unclear and text should use specific terms clarifying what is meant.	COUNTRY NAME
1.4 Supervision activities	[32]	New 2nd indent	Substantive	- operation of surveillance procedures - fruit sampling - surveillance capability	Fruit sampling is necessary as part of surveillance	COUNTRY NAME
1.6 Tolerance level	[44a]	After para 44	Substantive	add new paragraph after 44: <u>For quarantine pests the tolerance level generally equals zero. Setting the level of detection to zero implies that all units of the consignment must be included in the sample. Hence, for quarantine pests, a detection level that is as small as technically possible approaches the zero tolerance level.</u>	to explain the particular situation for quarantine pests	COUNTRY NAME
3. Phytosanitary Risk Categories and Measures	[61]	Whole para	Substantive	Move para 61 to after para 47	More appropriate location.	COUNTRY NAME