

Template for comments - Draft ISPMs for country consultation, 2008

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

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. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
<i>GENERAL COMMENTS</i>						
<i>SPECIFIC COMMENTS</i>						
TITLE	[1]		substantive	Evaluation and categorization of commodities according to their phytosanitary risk	A more precise wording for the process of examining commodities and assigning them phytosanitary risk status covered in this draft. If agreed, this word would need to be replaced throughout the whole draft standard.	USA
CONTENTS	[2]					
INTRODUCTION	[3]					
SCOPE	[4]					
SCOPE	[5]					
SCOPE	[6]	Whole para	technical	Move it to the Outline of Requirements section	This language is more appropriate for the Outline of Requirements section, not for the Scope.	USA
SCOPE	[7]	Add new para	Technical	<u>This standard does not consider the risk in cases where deviation from the declared intended use occurs.</u>	Moved from para #37, and added new wording for clarity.	USA
REFERENCES	[8]					
REFERENCES	[9]					
REFERENCES	[10]					
REFERENCES	[11]					
REFERENCES	[12]					
REFERENCES	[13]					
REFERENCES	[14]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
REFERENCES	[15]					
REFERENCES	[16]					
REFERENCES	[17]					
DEFINITIONS	[18]					
DEFINITIONS	[19]					
OUTLINE OF REQUIREMENTS	[20]					
OUTLINE OF REQUIREMENTS	[21]	1st sentence	Editorial	This standard uses the concept of phytosanitary risk categorization of commodities <u>which</u> combines ...	Better syntax	USA
OUTLINE OF REQUIREMENTS	[22]					
OUTLINE OF REQUIREMENTS	[23]	1st row	technical	This standard outlines four different <u>categories of</u> phytosanitary risk (two for processed commodities, two for unprocessed commodities)....	Better syntax	USA
BACKGROUND	[24]					
BACKGROUND	[25]					
BACKGROUND	[26]					
BACKGROUND	[27]					
BACKGROUND	[28]					
BACKGROUND	[29]					
BACKGROUND	[30]	Whole para	technical	Switch the order with para 31	For consistency with this standard. According with the draft standard, first you consider the method and degree of processing, then the intended use, if necessary.	USA
BACKGROUND	[31]	Whole para	technical	Switch the order with para 30	For consistency with this standard. According with the draft standard, first you consider the method and degree of processing, then the intended use, if necessary.	USA
BACKGROUND	[32]					
REQUIREMENTS	[33]					
REQUIREMENTS	[34]					
REQUIREMENTS	[35]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
REQUIREMENTS	[36]	1st indent 2nd indent	Editorial editorial	processed: those in which the nature of the material is <u>modified</u> in differing ways and degrees non-processed: those in which the nature of the material is not <u>modified</u> .	More appropriate word More appropriate word	USA
REQUIREMENTS	[37]	Whole sentence	Technical	delete	Move to the Scope section	USA
1. Elements of Categorization ...	[38]					
1. Elements of Categorization ...	[39]	2nd sentence	technical	The method and degree of processing, by itself, could significantly change the nature of the commodity, rendering unable to <u>harbour</u> pests.	“Harbour” is used to mean two different things in this document: - “be infested with” (e.g. harbour pests) - Introduce (e.g. harbour and spread) Clarify the meaning in each case.	USA
1. Elements of Categorization ...	[40]					
1. Elements of Categorization ...	[41]	1 st sentence Last sentence	Technical technical	The presence of contaminating pests, or infestation by other pests that may become associated with the commodity after processing Delete: as defined in ISPM No.5 (<i>Glossary of phytosanitary terms</i>) Delete: Common contaminating pests may be detected during inspection.	Unnecessary unnecessary	USA
1.1 Method and degree of ...	[42]					
1.1 Method and degree of...	[43]	Whole para	editorial	The primary objective of processing is to modify a commodity for other than phytosanitary purposes. <u>Such processing may affect the potential of the commodity to be infested.</u>	Better syntax	USA
1.1 Method and degree of...	[44]					
1.1 Method and degree of ...	[45]	Add new para at the end	technical	<u>The NPPOs of exporting countries should provide relevant information upon request to evaluate the phytosanitary status of the</u>	Make clear what the exporting country obligation is.	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				<u>commodity.</u>		
1.1 Method and degree of...	[46]					
1.1 Method and degree of ...	[47]					
1.1 Method and degree of...	[48]					
1.2 Intended use after import	[49]					
1.2 Intended use after import	[50]	2 nd indent Add 3 rd indent	Technical Technical	- consumption - <u>other uses without further alteration, including crafts, decorative products, cut flowers</u>	For clarity For clarity	USA
1.2 Intended use after import	[51]	Add new para	substantive	<u>Where phytosanitary requirements are based on other than intended use, include evidence, technical justification that non-intended use is occurring.</u>	Countries may need to consider unintended uses of a commodity for import but there should be evidence that unintended use could present a risk.	USA
2. Phytosanitary Risk Categories and ...	[52]					
2. Phytosanitary Risk Categories and ...	[53]	2 nd row	technical	intended use and its subsequent potential for <u>introducing</u> or spreading regulated pests...	Global change where harbouring actually means introducing. It is more accurate to use “introducing”. Consistent use of the term in other ISPMs.	USA
2. Phytosanitary Risk Categories and ...	[54]					
2. Phytosanitary Risk Categories and ...	[55]	1st row 2nd sentence	Technical technical	Commodities have been processed to the point where they have no capacity to <u>introduce</u> or spread regulated pests. Hence, no further analysis should be necessary and phytosanitary measures should not be <u>required</u> .	Global change where harbouring actually means introducing. It is more accurate to use “introducing”. Consistent use of the term in other ISPMs. Better wording	USA
2. Phytosanitary Risk Categories and ...	[56]					
2. Phytosanitary Risk Categories and ...	[57]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
2. Phytosanitary Risk Categories and ...	[58]	2nd row, in parenthesis	Editorial	(e.g. <u>cooking</u> temperature, duration of boiling or size of <u>chopped pieces</u>).		USA
2. Phytosanitary Risk Categories and ...	[59]	2 nd row	technical	commodity presents no phytosanitary risk and therefore should not be subject to phytosanitary measures, <u>except as necessary for contaminating pests or emergency actions</u> , the commodity...	It is important to include the possibility of treating consignments if contaminating pests are present.	USA
2. Phytosanitary Risk Categories and ...	[60]	Last sentence	technical	<u>PRA is recommended.</u>	It is up to the NPPO to decide if proceeding with a PRA.	USA
2. Phytosanitary Risk Categories and ...	[61]					
2. Phytosanitary Risk Categories and ...	[62]	Whole para	technical	<u>A PRA will be useful in determining whether</u> phytosanitary measures <u>are</u> required. The phytosanitary measures determined through the PRA may differ depending on the intended use of the commodity (e.g. consumption or processing). (Delete last sentence)	Unnecessary wording.	USA
2. Phytosanitary Risk Categories and ...	[63]	Last sentence	technical	<u>PRA is recommended.</u>	It is up to the NPPO to decide to proceed with a PRA.	USA
2. Phytosanitary Risk Categories and ...	[64]	Whole para	technical	Examples of commodities in this category include propagative material (e.g. <u>plants in vitro, micropropagative plant material, cuttings, seeds, seed potatoes and other plants to be planted</u>).	Plants in vitro and other micropropagative plant material could be added to Annex 2	USA
2. Phytosanitary Risk Categories and ...	[65]					
2. Phytosanitary Risk Categories and ...	[66]					
ANNEX 1	[67]	Annex 1	substantial	Change it into Appendix 1	This is additional information to the text. It is more appropriate as an Appendix. If agreed upon, the whole text needs to be revised for consistency.	USA
ANNEX 1: TITLE	[68]					
ANNEX 1: TABLE	[69]	Row 6, under Description	technical	<u>Process applied to cereal grain in which grains are germinated by soaking in water and then quickly halted from germinating</u>	Better definition for clarity.	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
		Row 8, under Example of resultant commodity	Technical	<u>further by drying/heating with hot air.</u> Preserved fruits, <u>nuts</u> , vegetables, tubers, bulbs		USA
		Row 12, under Example of	Technical	Crystallized fruit, fruit infused with sugar, <u>nuts</u>		
		Row 13, under Observations	Technical	Usually applied to a dried commodity. <u>Can be combined with sugar infusing.</u>		
		Add new process	Technical	Process: <u>Multi-method processing</u> Description: <u>includes a combination of multiple types of processing such as heating, high pressure, etc.</u> Example of resultant commodity: <u>plywood, particle board, wafer board</u>		
ANNEX 2	[70]	Annex 2	substantial	Change it into Appendix 2	This is additional information to the text. It is more appropriate as an Appendix. If agreed upon, the whole text needs to be revised for consistency.	USA
ANNEX 2: TITLE	[71]	title	technical	Examples of methods of processing with resultant commodities that <u>may</u> remain capable of harbouring or spreading pests	This is a possibility, not a fact.	USA
ANNEX 2: TABLE	[72]	Row 6, under Example	Technical	Dehydrated fruit, <u>vegetables</u> , sun dried tomatoes		USA
		Row 8, under Example	Technical	Peeled fruits, <u>vegetables</u> , grains, nuts		
		Row 11, under Example	technical	Pureed <u>fruits, vegetables</u>		
APPENDIX 1	[73]	Appendix 1	substantial	Change it into Annex 1	This flowchart is part of the draft, not additional information to it. If agreed upon, the whole text needs to be revised for consistency.	USA
APPENDIX 1: TITLE	[74]					
APPENDIX 1: FLOW	[75]	Add new	technical	See list below	This information could be useful to some	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
CHART		Appendix 3			NPPOs	

APPENDIX 3: EXAMPLES OF COMMODITIES BASED ON THEIR LEVEL OF PROCESSING AND ASSOCIATED PHYTOSANITARY RISK

1) No risk commodities

- Apple pectin	cottonseed thread	jam	sauce
- Apple sauce	crepe rubber	jello	sauce mix
- Avocado dip	dehydrated potatoes	jelly	seasoning
- Baby cereal	dehydro-frozen	juice concentrate	seasoning mix
- Baby food	dessert powder	kenaf	shellac
- Baby formula	dextrine	ketchup	sherbert
- Bakery mixes	dextrose	lactose	shredded
- Beeswax	dextrose hydrate	laminated beams	shredded coconut
- Beet pulp	dietary formula	lemonade	sisal
- Beet sugar	enzymes	leonardite	soft drinks
- Beverage concentrate	farina	maltose	soil inoculant
- Biscuit mix	flavouring	maple sugar	soup
- Bottled	flax fiber	maple syrup	soy corn
- Bran cereal bread	food coloring	marmalade	soy flour whey
- Brewer's malt	food flavouring	mashed potatoes	soy formula
- Brewer's yeast	food seasoning	mineral concentrate	soy isolates
- Bulgur wheat	food supplements	minerals	soy milk
- Cake mix	frappe mix	molasses	soybean inoculant
- Candied fruit	frappes	natural crepe rubber	soybean lecithin
- Candied peel	freeze-dried	nectar	starch
- Cane sugar	French fries	nitrogen soil culture	sucrose
- Canned	frozen food	nut butter oat cereal	sugar
- Cardboard	frozen juice	oil	sweetener
- Catsup	fructose	oil-cured olives	syrup
- Cellulose	fruit butter	oleomargarine	tea
- Cereal	fruit drink	orange juice concentrate	vanilla
- Citrus concentrate	fruit flavouring	ovaltine	vanilla extract
- Citrus pectin	fruit glaze	paper	vegetable flavoring
- Citrus pectin	fruit juice concentrate	peanut butter	vegetable juice
- Citrus pulp	fruit pie filling	pectin	vegetable mix
- Coconut milk	fruit pulp	pickled	vinegar
- Coffee (roasted)	fruitcake	pie filling	vitamins
- Condiments	glucose	plasterboard	wastepaper
- Confectioner's sugar	granulated	plywood boxes	wheat starch
- Cooked	guar bean derivative	pomace	wood flour
- Cooked cereal	gum	postum	wood pulp
- Corn cereal	gum turpentine	preserves	wood rosin

- Corn chip pellets	hominy	propolis	wood turpentine
- Corn soy blend	honey	pumice	
- Corn soy milk	honeycomb	relish	
- Corn starch	hops extract	rice cereal	
- Corn starch glucose	humate	rice, precooked	
- Corn syrup	hydrolized vegetable protein	rubber	
- Cottage cheese	hydrolized vegetables	salad dressing	
- Cotton cloth	hydrolyzed vegetable protein	salt	
- Cotton piece goods	hydrolyzed vegetables	sandwich spread	

2) Low Risk Commodities

- Fiber board
- Fluff wood pulp
- Furniture parts
- Molding made from wood
- Newsprint in bulk from wood pulp
- Nuts in bulk that are salted
- Particle board
- Plywood
- Preserved plant material
- Pressure treated wood
- Protein made from soybeans
- Pulp shreds made from beets
- Thread waste from cotton milling
- Veneer made from wood
- Wood impregnated with creosote/lubricants
- Wood: tongue-in-groove
- popcorn

3) Intermediate Risk Commodities

- Wood chips for processing into biomass fuels, pellets, OSB board
- Natural dried fruits
- Natural dried nuts
- Pet bedding wood shavings
- Broom corn
- Pine bark chips for potting mixes

4) High Risk Commodities

- Firewood
- Bamboo garden stakes
- Table stock potatoes
- Wheat for animal feed

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 (Para nber)

- 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. Paragraph number	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