

Template for comments - Draft ISPMs for country consultation, 2008

DRAFT 7/7: PEST FREE POTATO MICROPROPAGATIVE MATERIAL AND MINITUBERS FOR INTERNATIONAL TRADE

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>						
<i>SPECIFIC COMMENTS</i>						
TITLE	[1]					
CONTENTS	[2]					
INTRODUCTION	[3]					
SCOPE	[4]					
SCOPE	[5]	2nd row	Technical	<i>(Lycopersicon spp.)</i>	Suggest using recently accepted scientific name for potato	USA
SCOPE	[6]					
REFERENCES	[7]					
REFERENCES	[8]					
REFERENCES	[9]					
REFERENCES	[10]					
REFERENCES	[11]					
REFERENCES	[12]					
DEFINITIONS	[13]					
DEFINITIONS	[14]					
DEFINITIONS	[15]					
DEFINITIONS	[16]					
DEFINITIONS	[17]					
DEFINITIONS	[18]					
DEFINITIONS	[19]					
OUTLINE OF REQUIREMENTS	[20]					
OUTLINE OF REQUIREMENTS	[21]					
OUTLINE OF	[22]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
REQUIREMENTS						
OUTLINE OF REQUIREMENTS	[23]					
OUTLINE OF REQUIREMENTS	[24]					
BACKGROUND	[25]					
BACKGROUND	[26]					
REQUIREMENTS	[27]					
1. Responsibilities	[28]					
1. Responsibilities	[29]					
2. Pest Risk Analysis	[30]					
2. Pest Risk Analysis	[31]					
2.1 Pathway-specific lists of potato pests	[32]					
2.1 Pathway-specific lists of potato pests	[33]					
2.2 Risk management options	[34]					
2.2 Risk management options	[35]					
2.2.1 Potato micropropagative material	[36]					
2.2.1 Potato micropropagative material	[37]					
2.2.2 Minitubers	[38]					
2.2.2 Minitubers	[39]	2nd indent 1st row	Editorial	-production in pest free growing <u>media</u> under a protected...		USA
3. Production of Pest Free Potato Micropropagative Material	[40]					
3.1 Establishment of pest free ...	[41]					
3.1 Establishment of pest free ...	[42]	End of 1st sentence, footnote 1 make into 2 nd sentence	Technical	Where candidate material is determined to be infested with certain types of pest, it may be feasible, at the discretion of NPPO, for officially recognized techniques (e.g.	Important point that should be made part of the text.	USA

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		3rd row	Technical	meristem tip culture and thermotherapy) to be used in combination with conventional micropropagation to remove or eliminate the pest from the candidate material, an prior to the initiation of the <i>in vitro</i> multiplication programme. In such cases, laboratory testing must be used to confirm the success of this approach before multiplication commences.		
		Last row	technical	specified pests described below, potato plants <i>in vitro</i> should be inspected and found free from all... other pests and <u>disease symptoms and</u> from general microbial contamination.	The terms “practically free” are too general and open to interpretation. For clarification	
3.1.1 Testing	[43]					
3.1.1 Testing	[44]					
3.1.2 Secure phytosanitary environment	[45]					
3.1.2 Secure phytosanitary environment	[46]	1st indent	Technical	<u>prohibit the entry of non-authorized people; control the entry of authorized personnel and</u> of staff. Provision for the use of protective clothing, disinfection of footwear and had washing on entry (with particular care being taken if staff members work in areas of higher phytosanitary risk, e.g. the testing facility). <u>]</u>	These are not covered in the text	USA
3.2 Maintenance and propagation of ...	[47]					
3.2 Maintenance and propagation of ...	[48]					
3.3 Combined establishment and...	[49]					
3.3 Combined establishment and ...	[50]					
3.3 Combined establishment and ...	[51]					
3.3 Combined establishment and ...	[52]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
3.3 Combined establishment and ...	[53]					
4. Production of Pest Free Minitubers	[54]					
4. Production of Pest Free Minitubers	[55]					
4. Production of Pest Free Minitubers	[56]					
4. Production of Pest Free Minitubers	[57]					
4. Production of Pest Free Minitubers	[58]					
4. Production of Pest Free Minitubers	[59]					
4. Production of Pest Free Minitubers	[60]	2nd row	Technical	status) a screen house <u>with appropriate mesh size, constructed and maintained...</u>		USA
4. Production of Pest Free Minitubers	[61]					
4. Production of Pest Free Minitubers	[62]					
4. Production of Pest Free Minitubers	[63]					
5. Staff Competence	[64]					
5. Staff Competence	[65]					
5. Staff Competence	[66]					
6. Documentation	[67]					
6. Documentation	[68]					
6. Documentation	[69]					
7. Auditing	[70]					
7. Auditing	[71]					
7. Auditing	[72]					
8. Official Verification of Pest Freedom	[73]					
8. Official Verification of Pest Freedom	[74]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
8. Official Verification of Pest Freedom	[75]					
9. Certification	[76]					
9. Certification	[77]					
ANNEX 1	[78]					
ANNEX 1: TITLE	[79]					
ANNEX 1: TEXT	[80]	Last indent, last row	Technical	testing standards and any quality management procedures (e.g. ISO or equivalent international quality measure procedures).		USA
ANNEX 2	[81]					
ANNEX 2: TITLE	[82]					
ANNEX 2: TEXT	[83]					
ANNEX 2: TEXT	[84]					
ANNEX 3	[85]					
ANNEX 3: TITLE	[86]					
ANNEX 3: TEXT	[87]					
ANNEX 3: Physical structure	[88]					USA
ANNEX 3: Environment controls	[89]					
ANNEX 3: Crop management	[90]	Add new indent	technical	- use of <u>raised benches</u>		USA
ANNEX 3: Growing media, fertilizer, water	[91]					
ANNEX 3: Post harvest handling	[92]					
ANNEX 3: TEXT	[93]					
APPENDIX 1	[94]					
APPENDIX 1: TITLE	[95]	Title	Editorial	<u>Pests Commonly tested for</u>	Suggest rewording	USA
APPENDIX 1: TABLE	[96]	Add new column	Technical	Suggest to add a column for testing procedures	Useful information for NPPOs	USA
APPENDIX 2	[97]					
APPENDIX 2: TITLE	[98]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
APPENDIX 2: TEXT	[99]					
APPENDIX 2: Bacteria	[100]	Whole section	Technical	Add describing authority, order , and family		USA
APPENDIX 2: Fungi	[101]	Whole section	Technical	Add describing authority, order , and family		USA
APPENDIX 2: Insects	[102]	Whole section	technical	Add describing authority, order , and family		USA
APPENDIX 2: Nematodes	[103]	Whole section	technical	Add describing authority, order , and family		USA
APPENDIX 2: Protozoa	[104]	Whole section	technical	Add describing authority, order , and family		USA

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. ~~striketrough~~), 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 number)

- 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 <u>plants 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</u>	to explain the particular situation for quarantine pests	COUNTRY NAME

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				<p><u>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></p>		
3. Phytosanitary Risk Categories and Measures	[61]	Whole para	Substantive	Move para 61 to after para 47	More appropriate location.	COUNTRY NAME