

Template for comments - Draft ISPMs for country consultation, 2008

DRAFT 1/7: REVISED ISPM NO. 15 - REGULATING WOOD PACKAGING MATERIAL IN 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]					
SCOPE	[6]	2nd. row	editorial	Mold fungi		USA
REFERENCES	[7]					
REFERENCES	[8]					
REFERENCES	[9]					
REFERENCES	[10]					
REFERENCES	[11]					
REFERENCES	[12]					
REFERENCES	[13]					
REFERENCES	[14]					
REFERENCES	[15]					
REFERENCES	[16]					
DEFINITIONS	[17]					
DEFINITIONS	[18]					
OUTLINE OF REQUIREMENTS	[19]					
OUTLINE OF REQUIREMENTS	[20]	1st sentence	technical	Approved phytosanitary measures that significantly reduce the risk of pest introduction and spread via wood packaging material comprise a combination of approved treatments and recognized marking.	In IPPC terminology, “spread” is the expansion of a pest within an area. We need to add the term “introduction” to convey movement of a pest into an area where is not present or present but no widely distributed.	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
		Add 2nd para	Substantive	Bark removal as required in this standard also provides protection of re-infestation of some wood pests and to reduce any risk of surviving pests.	Removal of bark should only be required in addition to one of the other treatments specified in this draft, if removal is technically justified. Otherwise, debarking should not be required with certain treatments (such as heat treatment) where such treatments are effective whether or not bark has been removed. Debarking should only be required when technically justified. This statement provides the technical justification for bark removal. Requiring removal of bark from ALL wood is not consistent with IPPC principles of minimal impact and technically justified measures. Without this statement, paragraph 66 would have to be modified to indicate that removal of bark is optional when applying heat treatment.	USA
OUTLINE OF REQUIREMENTS	[21]					
REQUIREMENTS	[22]					
1. Basis for regulating	[23]					
1. Basis for regulating	[24]	3 rd row	technical	and therefore becomes a pathway for the <u>introduction and spread</u> of quarantine pests.	The logical sequence is first the introduction of a pest in a new area and then the spread of that pest within the area.	USA
		Last sentence	Technical	For this reason, this standard describes internationally accepted measures that are approved and that may be applied to wood packaging material by all countries to reduce significantly the risk of <u>introduction and spread</u> of most quarantine pests as well as a number of other pests that may be <u>infesting</u> that material.	The logical sequence is first the introduction of a pest in a new area and then the spread of that pest within the area. Pest associated with WPM may include hitchhikers and other contaminating pests which are excluded from the scope of this standard.	
		Additional language at the end of this section	Substantive	Requiring phytosanitary measures beyond an approved measure as described in this standard requires technical justification.	This language is presently in ISPM 15 (Section 1 – Basis for Regulating; Section 2- Regulated WPM; and Section 3.3 - Other measures) but was omitted in the	

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
					proposed revision. The language is essential and should be retained as its omission is detrimental to the use of the standard without this language. Any country could place more restrictive measures on WPM without having to produce technical justification.	
2. Regulated Wood Packaging Material	[25]					
2. Regulated Wood Packaging Material	[26]	footnote 1, first row	Technical	Wood packaging material is usually made from true woody plants such as conifers and woody <u>dicotyledonous plants</u> .	Proper name and consistent with the term “monocotyledonous” in the 2 nd sentence.	USA
2.1 Exemptions	[27]					
2.1 Exemptions	[28]					
3. Phytosanitary Measures for Wood Packaging...	[29]					
3.1 Approved phytosanitary measures	[30]					
3.1 Approved phytosanitary measures	[31]					
3.1 Approved phytosanitary measures	[32]	New 2nd sentence	substantive	In addition to the recommended chemical and thermo treatments, debarking is required to provide additional protection from re-infestation and to reduce any risk of surviving pests.	In accordance with comment in para # 20	USA
3.1 Approved phytosanitary measures	[33]	2nd row	editorial	official mark in accordance with Annex 2, the mark consisting of the symbol used in conjunction with codes...	The word “close” is unnecessary.	USA
3.2 Approval of new or revised treatments	[34]					
3.2 Approval of new or revised treatments	[35]					
3.3 Alternative requirements	[36]					
3.3 Alternative requirements	[37]	Add a 3rd sentence	Technical	Alternative requirements for wood packaging material <u>should be technically justified and respect the principle of transparency, non-discrimination and equivalence. However, for the purpose of</u>	The proposed draft language leaves much more room for interpretation than the original, more comprehensive language. Including the original language in the present text eliminates any erratic or	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				<u>international harmonization, such arrangements are not encouraged.</u>	impulsive imposition of other requirements without scientific proof of value.	
4. Responsibilities of NPPOs	[38]					
4. Responsibilities of NPPOs	[39]	1 st row	technical	To meet the objective of preventing the <u>introduction and spread</u> of pests (Article I.1 of the IPPC), both...	The logical sequence is first the introduction of a pest in a new area and then the spread of that pest within the area.	USA
4.1 Regulatory considerations	[40]					
4.1 Regulatory considerations	[41]					
4.1 Regulatory considerations	[42]					
4.2 Marking	[43]					
4.2 Marking	[44]					
4.3 Treatment and marking requirements...	[45]					
4.3 Treatment and marking requirements ...	[46]	1st sentence 3rd sentence	Technical Technical	NPPOs of exporting <u>countries</u> are responsible... All new components added to <u>repaired</u> wood packaging material must be made of wood treated and marked in accordance with this standard or be constructed or fabricated from processed wood material.	Exporting countries may not necessarily be contracting parties but they have to abide by import requirements too. Section 4.3.3 of this draft states any previous marks be obliterated and if the “remanufactured” WPM is to be remarked, it must be retreated. Therefore, it is not appropriate to require that “remanufactured” WPM be manufactured with wood treated and marked in accordance with this standard since the “remanufactured” WPM must be retreated anyway. This sentence applies to repaired WPM only.	USA
4.3.1 Reuse of wood packaging material	[47]					
4.3.1 Reuse of wood	[48]					

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
packaging material						
4.3.2 Repaired wood packaging material	[49]					
4.3.2 Repaired wood packaging material	[50]					
4.3.2 Repaired wood packaging material	[51]					
4.3.3 Remanufactured wood packaging material	[52]					
4.3.3 Remanufactured wood packaging material	[53]					
4.3.3 Remanufactured wood packaging material	[54]					
4.4 Transit arrangements	[55]					
4.4 Transit arrangements	[56]					
4.5 Procedures upon import	[57]					
4.5 Procedures upon import	[58]					
4.5 Procedures upon import	[59]	2nd row	editorial	of phytosanitary inspections, cooperation with <u>other organizations</u> not normally involved with meeting phytosanitary...	Better term	USA
4.6 Measures for non-compliance at point of ...	[60]					
4.6 Measures for non-compliance at point of ...	[61]					
4.6 Measures for non-compliance at point of ...	[62]	3rd row	Editorial	the form of detention, removal of non-compliant material, treatment, <u>reshipment</u> or destruction.	Logical sequence.	USA
ANNEX 1	[63]					
ANNEX 1: TITLE	[64]					
ANNEX 1: TEXT	[65]					
ANNEX 1: TEXT	[66]	Add a title to this para	technical	Bark removal	On this draft, bark removal is considered a treatment, in addition to heat and fumigation with MB treatments.	USA
ANNEX 1: Heat treatment	[67]					
ANNEX 1: Heat treatment	[68]					

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
ANNEX 1: Heat treatment	[69]					
ANNEX 1: Methyl bromide treatment	[70]					
ANNEX 1: Methyl bromide treatment	[71]	1st sentence and footnote 3	substantive	remove	It is inappropriate to incorporate a political statement into the international guidelines. It may well be right and proper to reduce and subsequently eliminate the use of MB. However, adding references into the standard that encourage NPPOs to limit the use of alternative treatment methods is out of place. Many countries, and even localities, still have no access to the preferred heat treatment method. Inserting this political statement into the standard merely causes confusion among shippers and raises concerns WPM treated with the alternative method will be embargo. There are more fitting venues and methods for encouraging not only the elimination of MB use but also the development of new environmentally friendly treatment options.	USA
ANNEX 1: Methyl bromide treatment	[72]					
ANNEX 1: Methyl bromide treatment	[73]					
ANNEX 1: Methyl bromide treatment (table 1)	[74]	Whole table	Technical	Suggest to remove this table	It is not helpful.	USA
ANNEX 1: Methyl bromide treatment	[75]					
ANNEX 1: Methyl bromide treatment (table 2)	[76]					
ANNEX 1: Methyl bromide treatment	[77]	6 indent, 1st sentence 7 indent	editorial technical	Methyl bromide treatment must not be carried out on wood packaging material exceeding 20 cm in minimum <u>diameter</u> . Add a footnote to include a formula (or reference to a formula) or a table to calculate compensation.	Diameter is more commonly used than cross section. Need calculations for chloropicrin if we need to compensate for gas mixtures. This information would be more useful for NPPOs.	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
		9 indent, add a new sentence at the end	technical	<u>Treat at commodity temperature, not ambient air temperature.</u>	It is the commodity temperature that counts to calculate the dosages.	USA
ANNEX 2	[78]					
ANNEX 2: TITLE	[79]					
ANNEX 2: TEXT	[80]					
ANNEX 2: Symbol	[81]					
ANNEX 2: Symbol	[82]					
ANNEX 2: Country code	[83]					
ANNEX 2: Country code	[84]					
ANNEX 2: Producer code	[85]					
ANNEX 2: Producer code	[86]	2nd row	Editorial	... <u>who</u> is responsible for ensuring appropriate wood is used and properly marked ...		USA
ANNEX 2: Text on mark	[87]	2 nd sentence	technical	The size and position of the mark may vary <u>provided the mark increases or decreases proportionally in size to the following examples</u> , but its size must be sufficient to be both visible to inspectors without the use of a visual aid.	Added language clarifying that the mark shall closely resemble the examples in the standard.	USA
ANNEX 2: Text on mark	[88]					
ANNEX 2: Text on mark	[89]	2nd indent	Technical	- durable and <u>permanent</u>	The word “permanent” is more appropriate and includes the “not transferable” concept in it. In addition, the new wording eliminates the option for “tags and labels”. These are a concern because they might be reused on improperly treated WPM.	USA
ANNEX 2: Text on mark	[90]					
ANNEX 2: Text on mark	[91]					
ANNEX 2: Text on mark	[92]					
ANNEX 2: Text on mark	[93]					
ANNEX 2: Text on mark	[94]	1st sentence	Substantive	The examples below illustrate acceptable variants of the required components of the mark that is used to certify that the wood	Before any variations of the mark are accepted, confirmation from FAO legal council that numerous mark formats are	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
				packaging material that bears such a mark has been subjected to an approved phytosanitary measure.	defensible needs to be received. The draft text would seem to indicate that the list is not all inclusive and that other formats may be acceptable. If this is the case, the US does not support the language. The US feels that the more variants permitted the more difficult it will be for an NPPO to maintain control of the mark and the more difficult it will be for customs officials to determine if the mark is legitimate. The US continues to support the one mark format that has been successfully used since 2002 for WPM and feels that it is sufficient but will support the other formats that are proposed in the draft in special situations.	
ANNEX 2: Text on mark	[95]	Example 1				
ANNEX 2: Text on mark	[96]	Example 2				
ANNEX 2: Text on mark	[97]	Example 3				
ANNEX 2: Text on mark	[98]	Example 4				
ANNEX 2: Text on mark	[99]	Example 5				
ANNEX 2: Text on mark	[100]	Example 6				
APPENDIX 1	[101]					
APPENDIX 1: TITLE	[102]					
APPENDIX 1: TEXT	[103]					
APPENDIX 1: TEXT	[104]					
APPENDIX 1: TEXT	[105]					
APPENDIX 2	[106]					
APPENDIX 2: TITLE	[107]					
APPENDIX 2: TEXT	[108]					

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	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