

Advanced comments prior to CPM-5 on Annex 3 of CPM 2010/2

**DRAFT STANDARD:
DESIGN AND OPERATION OF POST-ENTRY QUARANTINE STATIONS FOR PLANTS**

In accordance with the IPPC Standard Setting Procedure adopted by CPM-3 (2008), comments on draft ISPMs should be sent to the IPPC Secretariat at least 14 days before the Commission on Phytosanitary Measures (CPM) meeting. Members are invited to submit this template to the Secretariat by Monday, 8 March 2010. Submission by e-mail to ippc@fao.org is preferred.

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

Members are invited to take the following points into account in preparation for the CPM and in accordance with the decision at the 6th Session of the Interim Commission on Phytosanitary Measures (ICPM-6) in 2004 in relation to the improvements of standard-setting procedures:

- a) Members should endeavour to provide only substantive comments at meetings of the CPM.
- b) Members should endeavour to provide comments in writing to the Secretariat at least 14 days before the CPM. The Secretariat will provide a copy of all comments received (in original form or as compiled comments) at the start of the CPM.
- c) Members should indicate which comments are strictly editorial (i.e. they do not change the substance of the text) and could be incorporated by the Secretariat as considered appropriate and necessary.

1. Section		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						
CONTENTS						
INTRODUCTION						
Scope						
References						
Definitions						
Outline of Requirements						
BACKGROUND		Determining the need for post-entry quarantine as a phytosanitary measure, 1st paragraph, add new 3rd sentence	sustantive	The PRA determines the pest risk associated with the plants for planting and identifies phytosanitary measures, which may include post-entry quarantine, to manage the risk. PRA will determine if PEQ is needed, and for how long PEQ is necessary.	This concept should be included more explicitly since for some diseases (e.g. many viruses) the length of time for symptoms to appear may be several years.	USA
REQUIREMENTS						
1. General Requirements						

1. Section		3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
for PEQ Stations						
2. Specific Requirements for PEQ Stations						
2.1 Location						
2.2 Physical requirements		7 indent	Sustantive	- Access into and within the station (to avoid traffic in areas where plants for planting in quarantine are being grown)	The movement of people within the facility should be controlled as much as the movement of people into the facility.	USA
		13 indent	sustantive	- Decontamination room for workers and clothing	The need to wash clothes in the facility rather than carrying potentially contaminated clothes out of the facility should be added.	USA
2.3 Operational requirements						
2.3.1 Staff requirements						
2.3.2 Technical and operational procedures						
2.3.3 Record keeping		4th indent	Substantive	- A record of all PEQ activities conducted in the station (e.g. staff activities, inspections, pest detections, pest identifications, testing, treatments, disposal and release of consignments of plants for planting in quarantine)	These are important activities that need to be recorded.	USA
2.4 Diagnosis and removal of quarantine pests or vectors						
2.5 Audit of PEQ stations						
3. Completion of PEQ Process						
APPENDIX 1: Requirements for PEQ stations						

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. 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.

3. 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.

4. 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.

5. 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.

6. 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	3. Sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
BACKGROUND	1. Sentence 1 2. Sentence 2	1. Substantive 2. Technical	The main purpose of the IPPC is to protect plants secure common and effective actions to prevent the spread and introduction of pests of plants and plant products . 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	Sentence 4	Editorial	Thus <u>Additionally</u> , while pursuing the ...	Clearer wording	COUNTRY NAME
1.4 Supervision activities	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	New 2nd indent	Substantive	- operation of surveillance procedures - <u>fruit sampling</u> - surveillance capability	Fruit sampling is necessary as part of surveillance	COUNTRY NAME
1.6 Tolerance level	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	Whole para	Substantive	Move para 61 to after para 47	More appropriate location.	COUNTRY NAME