

Advanced comments prior to CPM-5 on Annex 1 of CPM 2010/2

**DRAFT STANDARD:  
PEST FREE POTATO (SOLANUM SPP.) MICROPROPAGATIVE MATERIAL AND MINITUBERS FOR INTERNATIONAL  
TRADE**

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](mailto: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>						
<b>TITLE</b>						
<b>CONTENTS</b>						
<b>INTRODUCTION</b>						
<b>Scope</b>						
<b>References</b>						
<b>Definitions</b>						
<b>Outline of Requirements</b>		Last paragraph 1st sentence	substantive	<b>All facilities should be <b>officially</b> audited. by the NPPO.</b>	<b>Facilities should be audited but because the NPPOs may operate the facilities, they cannot audit themselves. In this case, it would be preferable that an authorized entity outside the NPPO would perform the auditing. By definition, the term “official” implies the NPPO or any other authorized entity.</b>	USA
<b>BACKGROUND</b>						
<b>REQUIREMENTS</b>						

1. Section		3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
1.Responsibilities						
2.Pest Risk Analysis		1st paragraph 2nd sentence	substantive	<b>PRA should be carried out by the NPPO of the importing country in accordance with ISPM 2:2007 and ISPM 11:2004 for the pathways of “potato micropropagative material” and “minitubers” from given origins.</b>	<b>PRA should be carried out in accordance with ISPMs No. 2 and No.11. PRAs can be conducted by anyone, but the importing country is responsible for furnishing technical justification.</b>	USA
2.1 Pathway-specific lists of regulated potato pests						
2.2 Pest risk management options						
2.2.1 Potato micropropagative material						
2.2.2 Minitubers						
3. Production of Pest Free Potato Micropropagative Material						
3.1 Establishment of pest free potato micropropagative material						
3.1.1 Testing programme to verify pest freedom						
3.1.2 Establishment facilities						
3.2 Maintenance and propagation facilities for pest free potato micropropagative material						
3.3 Combined establishment and maintenance facilities						
3.4 Additional specifications for potato micropropagation facilities and potato						

1. Section		3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
micropropagative material						
4. Production of Pest Free Minitubers						
4.1 Eligible material						
4.2 Minituber facilities		1st paragraph, 1st sentence	Substantive	A minituber production facility should be operated as a pest free production site (as described in ISPM 10:1999). <del>with respect to pests regulated by the importing country for minitubers</del>	The facility should be pest free of all pests, not just pests regulated by the importing country, since the facility should be sanitary and contained.	USA
		Last paragraph 1st sentence	Substantive	The entry of authorized personnel to the facility should be controlled and provision should be made for use of protective clothing, disinfection of footwear and hand washing on entry <b>to prevent contamination from dirty to clean areas. Clothes, coveralls, etc., may be washed within the facility so that dirty clothing does not carry anything out of the facility.</b>	The draft requires controlling entry into the facility but does not address movement within the facility in several places. We suggest that additional information be added to address movement within facility, usually moving from “clean” areas to “dirtier” areas to prevent contamination within the facility.	USA
5. Staff Competence						
6. Documentation and Record-Keeping						
7. Auditing		1st paragraph	substantive	All facilities, systems and records should be officially audited by <del>the NPPO of</del> the exporting country to ensure compliance with the procedures and maintenance of the pest free status of the plants.	According to this standard, facilities can be operated by the NPPO of the exporting country. Therefore, the auditing should not be limited to the NPPO. The word “officially” already implies auditing by the NPPO or its authorized entity.	USA
8. Phytosanitary Certification						
ANNEX 1: General requirements for official testing laboratories for potato micropropagative material and minitubers						
ANNEX 2: Additional specifications for potato						

1. Section		3. sentence/ row/indent, etc.	4. Type of comment	5. Proposed rewording	6. Explanation	7. Country
micropropagation facilities						
ANNEX 3: Additional requirements for minituber production facilities						
APPENDIX 1: Pests that may be of concern with respect to potato micropropagative material						
APPENDIX 2: Pests that may be of concern with respect to potato minituber production		Under Fungi, <i>Phytophthora</i> spp.	Technical	Add a new taxon: <b>Chromista</b>	<b><i>Phytophthora</i> spp. are not considered under the Fungi Kingdom any more. They are now classified under the Chromista Kingdom.</b>	USA
		Under Insecta, <i>Tecia solanivora</i>	technical	<b><i>Tecia solanivora</i> (Povolny)</b>	<b>Correct author name</b>	USA
APPENDIX 3: Flow chart showing the normal sequence of establishment, maintenance and production of pest free potato micropropagative material and minitubers		Flow chart symbols	technical		<b>Suggest to review symbols to ensure they conform with the standard flowchart format</b>	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. 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
<b>BACKGROUND</b>	1. Sentence 1 2. Sentence 2	1. Substantive 2. Technical	The main purpose of the IPPC is to <del>protect</del> <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
<b>BACKGROUND</b>	Sentence 4	Editorial	<del>Thus</del> <u>Additionally</u> , while pursuing the ....	Clearer wording	COUNTRY NAME
<b>1.4 Supervision activities</b>	Sentence 3	Substantive	The FF-ALPP programme, including <del>regulatory control</del> <u>domestic regulation</u>	The term regulatory control is unclear and text should use specific terms clarifying what is meant.	COUNTRY NAME
<b>1.4 Supervision activities</b>	New 2nd indent	Substantive	- operation of surveillance procedures <del>- fruit sampling</del> - surveillance capability	Fruit sampling is necessary as part of surveillance	COUNTRY NAME
<b>1.6 Tolerance level</b>	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
<b>3. Phytosanitary Risk Categories and Measures</b>	Whole para	Substantive	Move para 61 to after para 47	More appropriate location.	COUNTRY NAME