

Template for comments - Draft ISPMs for country consultation, 2010

**DRAFT ANNEX TO ISPM 28:2009  
IRRADIATION TREATMENT FOR *CERATITIS CAPITATA***

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	3. sentence/ row/indent, etc.	4. Type of comment (Substantive, Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
<b>GENERAL COMMENTS</b>					<ul style="list-style-type: none"> <li>Use scientific names with full describing authority. When referring to species, the entire scientific name needs to be included. It helps ID synonyms, translation. No common names should be used to avoid confusion later on.</li> </ul>	USA
<b>TITLE</b>		title	substantive	<b>Irradiation treatment for <i>Ceratitidis capitata</i> (Wiedemann)</b>	<b>Add authority (correct taxonomy). Global change.</b>	USA
<b>Adoption</b>	[1]					
<b>Adoption</b>	[2]					
<b>Scope of the treatment</b>	[3]					
<b>Scope of the treatment</b>	[4]					
<b>Treatment description</b>	[5]					
<b>Name of treatment</b>	[6]					
<b>Active ingredient</b>	[7]					
<b>Treatment type</b>	[8]					
<b>Target pest</b>	[9]					
<b>Target regulated articles</b>	[10]					
<b>Treatment schedule</b>	[11]	(g)	Substantive	<b>Efficacy and confidence level of the treatment is ED<sub>99.9970</sub> at the 95% confidence level <u>under non-modified atmospheric conditions.</u></b>	<b>The added wording makes the statement more specific and clearer to the reader. It is also more accurate and consistent with ISPM 18, Section 3.</b>	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
		(h)	Substantive	delete	No need to repeat the statement in the Scope. The document could be more concise and streamlined if the information is found only in one place instead of several places within the document.	USA
		(i)	substantive	Delete	The draft does not need to include a separate statement on modified atmospheres. A sentence has been added to (g). There is no reference to modified atmospheres because there are no studies that focus on this. It would be clearer to state that the studies used were not done in a modified atmosphere. Although it does not affect how much dose is absorbed, it may affect how the organism is affected.	USA
Other relevant information	[12]	(k)	Substantive	The Technical Panel on Phytosanitary Treatments based its evaluation of this treatment on the research work undertaken by Follett and Armstrong (2004) and Torres-Rivera and Hallman (2007), which determined the efficacy of irradiation as a treatment for this pest in <i>Carica papaya</i> and <i>Mangifera indica</i> . <a href="#">This dosage is effective on all commodities for Mediterranean fruit fly provided that they adhere to the requirements set forth in ISPM 18.</a>	This reference is irrelevant. It makes it seem like this treatment is just based on these commodities. It may be confusing for readers to grasp. The dose is the dose no matter the commodity, so specific examples are not needed. Also, countries are not intended to test the dose from commodity to commodity. This dosage is effective on all commodities for MFF, provided the calibration requirements are met as set forth by ISPM 18, which is already mentioned as reference in the draft. The Annex should clearly indicate that this treatment applies no matter what the commodity is.	USA
		(l)	substantive	Extrapolation of treatment efficacy to all fruits and vegetables was based on knowledge and experience that radiation dosimetry systems measure the actual radiation dose absorbed by the target pest independent of host commodity, and evidence from research studies on a	This Annex does not need references with other pests besides <i>Ceratitidis capitata</i> (Wiedemann). None of these examples deal specifically with Medfly and thus are irrelevant. Examples may confuse irradiation understanding. This Annex is written to apply as a treatment for	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment (Substantive, Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
				variety of pests and commodities. <a href="#">(Follett, 2009)</a> . These include studies on the following pests (with hosts in parenthesis): <i>Anastrepha ludens</i> ( <i>Citrus paradisi</i> and <i>Mangifera indica</i> ), <i>A. suspensa</i> ( <i>Averrhoa carambola</i> , <i>Citrus paradisi</i> and <i>Mangifera indica</i> ), <i>Bactrocera tryoni</i> ( <i>Citrus sinensis</i> , <i>Lycopersicon lycopersicum</i> , <i>Malus domestica</i> , <i>Mangifera indica</i> , <i>Persea americana</i> and <i>Prunus avium</i> ), <i>Cydia pomonella</i> ( <i>Malus domestica</i> , also artificial diet) (Bustos <i>et al.</i> , 2004; Gould and von Windeguth, 1991; Hallman, 2004; Hallman and Martinez, 2001; Jessup <i>et al.</i> , 1992; Mansour, 2003; von Windeguth, 1986; von Windeguth and Ismail, 1987). It is recognized, however, that treatment efficacy has not been tested for all potential fruit and vegetable hosts of the target pest. If evidence becomes available to show that the extrapolation of the treatment to cover all hosts of this pest is incorrect, then the treatment will be reviewed.	<i>Ceratitis capitata</i> (Wiedemann) for any commodity. Replace all references with Follett (2009).	
References	[13]					
References	[14]					
References	[15]					
References	[16]	Para  Add new (16) reference	Substantive  substantive	Delete  <a href="#">Follett, P.A. 2009. Generic Radiation Quarantine Treatments: The Next Steps. <i>Journal of Economic Entomology</i>, 102(4):1399-1406.</a>	This reference does not deal specifically with Medfly and thus is irrelevant	USA  USA
References	[17]	Para	Substantive	Delete	This reference does not deal specifically with Medfly and thus is irrelevant	USA
References	[18]	Para	Substantive	Delete	This reference does not deal specifically with Medfly and thus is irrelevant	USA

1. Section	2. Paragraph number	3. sentence/row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
References	[19]					
References	[20]	Para	Substantive	Delete	This reference does not deal specifically with Medfly and thus is irrelevant	USA
References	[21]	Para	Substantive	Delete	This reference does not deal specifically with Medfly and thus is irrelevant	USA
References	[22]					
References	[23]					
References	[24]					

## INSTRUCTIONS FOR THE USE OF THE TEMPLATE

A template is provided to facilitate the submission and compilation of member comments. The instructions have been modified since last year; please review both the instructions and the examples. Paragraph numbers have been included in the draft standards, and each paragraph has a row in the template with the corresponding number. 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 or formatting of the actual table.
- 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 to the text of the standard, subsequent comments should continue to refer to the paragraph numbers used in the draft standard sent for consultation.
- only one type of comment should be made in each row of the template; when more than one type of comment needs to be made on the same paragraph, **insert a new row**, include all appropriate information (including paragraph number) and fill in your comment. **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~~), and not tracked changes of the Word processor
- only include those sentences from the draft standard to display the suggested modifications. Do not include paragraphs or sentences for which no modifications are suggested.
- to provide a comment on a footnote, please enter it in a row with the number of the paragraph with which the footnote is associated.
- delete the rows of the template in which no comments are made.

### Specific guidelines for each column in the template and examples of comments

General comments apply to the entirety of the standard. Comments on specific sections of the standard can be provided as described below.

#### **1. Section**

- This gives the titles of sections as they appear in the draft, plus a row for general comments. To propose changes to section titles, include new wording in the "proposed rewording" column.

#### **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 paragraph 51 to after paragraph 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 also numbered similar to the paragraphs
- 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 type of comment refers to one of the three choices: substantive, editorial, or translation. Please only use these keywords: Substantive, Editorial, Translation.

- substantive comments include technical comments. They take into account conceptual changes, addition of new aspects or ideas, scientific corrections and technical adjustments.
- 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 (Substantive, Editorial, Translation) only	5. Proposed rewording	6. Explanation	7. Country
BACKGROUND	[9]	Sentence 1	Substantive	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>	To be consistent with the text of the IPPC.	COUNTRY NAME
BACKGROUND	[9]	Sentence 2	Editorial	In doing so, contracting parties undertake the promotion of appropriate measures for the control of <u>regulated</u> pests.	The scope of the IPPC addresses regulated pests.	COUNTRY NAME
BACKGROUND	[17]	Sentence 4	Editorial	<del>Thus</del> <u>Additionally</u> , while pursuing the ....	Clearer wording	COUNTRY NAME
1.4 Supervision activities	[26]	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
1.4 Supervision activities	[32]	New 2nd indent	Substantive	- operation of surveillance procedures <del>- fruit sampling</del> - 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	Editorial	Move para 61 to after para 47	More appropriate location.	COUNTRY NAME