Template for comments - Draft ISPMs for country consultation, 2010

DRAFT: *INTEGRATED MEASURES APPROACH FOR PLANTS FOR PLANTING 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. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
GENERAL COMMENTS					• The US welcomes a new standard for phytosanitary cleanliness, necessary in the international movement of plants. We believe the use of integrated measures will help curtail the movement of associated regulated pests and possibly, other non-regulated pests. However, the draft does not take into consideration the needs of those importing few plants for planting that do not originate in large production fields and greenhouses. While the same outcome of phytosanitary cleanliness should be expected for small lots of plants, the same level of regulation and documentation should not be required. NPPOs should keep this in mind when applying these guidelines into regulations and make exceptions for small lots of plants originating outside large production facilities.	USA
					• The IPPC definition of "systems approach" includes at least two independent risk management measures. Limiting the standard to "systems approaches" for plants for planting would exclude situations where risk-based single measures may be sufficient or desirable. The draft standard includes several references to single measures	USA

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					which may be used, if they are sufficient to manage a particular pest risk. • The US suggests discarding the notion of establishing two categories of plants for planting (low and high risk) in recognition of the continuum of risk presented by such a diverse commodity group as the plants for planting, originating from many places and under a variety of phytosanitary conditions.	USA
TITLE		Title	Substantive	**Use of ~~I~~integrated measures ~~approach~~ for plants for planting ~~in international trade~~**	**We suggest to drop the term "approach" from the title and throughout the text so there is less confusion with the concept of "systems approach". Global change. No need to add international trade: all ISPMs apply to trade.**	USA
Contents						
Introduction	[1]					
SCOPE	[2]					
SCOPE	[3]	1st sentence	Substantive	**This standard provides guidelines for the development and implementation of integrated measures to manage the pest risks associated with the production and international movement of commercial shipments of plants for planting (excluding sedes).**	**In consideration for smaller shipments of few plants for planting, the Scope should indicate this standard applies to commercial shipments.**	USA
REFERENCES	[4]					
REFERENCES	[5]					
REFERENCES	[6]					
REFERENCES	[7]					
REFERENCES	[8]					
REFERENCES	[9]					

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
REFERENCES	[10]					
REFERENCES	[11]					
REFERENCES	[12]					
REFERENCES	[13]					
Definitions	[14]					
Definitions	[15]					
Outline of requirements	[16]					
Outline of requirements	[17]					
Outline of requirements	[18]	Para	Substantive	**The standard provides guidance on two types of integrated measures ~~approaches~~: general integrated measures and ~~integrated measures for high-risk situations~~ risk-based integrated measures. Requirements for establishing the integrated mesures and for authorizing places of production are also provided. Specific guidance is included on non-compliances in ~~high-risk situations~~ risk-based integrated measures.**	**The two-tier approach of "General integrated measures" (3.1) and "Integrated measures in high risk situations" (3.2) does not appear realistic. The PRA-based process proposed in the standard will likely result in a range of estimated pest risks in different situations, with a corresponding range in the stringency and complexity of the risk management measures required. In practice, it would be exceedingly difficult to separate the level of risk into "general" or "high" only, and even "high" risks will vary in different situations, and may require varying combinations of integrated measures. It would therefore be more useful to consider the "general integrated approach" in Section 3.1 as the minimum requirement for approaches covered in the standard, whereas varying combinations of "risk-based integrated approaches" in Section 3.2 may additionally be required to address specific pest risks. Global change.**	USA
Outline of requirements	[19]					

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
BACKGROUND	[20]					
BACKGROUND	[21]					
BACKGROUND	[22]	First sentence	Substantive	**~~Export~~ Phytosanitary ~~i~~nspections of consignments of plants for planting has limitations:**	**The standard is relevant to both, importing and exporting countries.**	USA
BACKGROUND	[23]	First sentence	Substantive	**~~An i~~Integrated measures ~~approach~~ for pest risk management may provide an alternative or supplement to single measures (particularly point of entry inspection) or more restrictive measures (such as prohibition or post-entry quarantine) to meet the phytosanitary import requirements of the importing country.**	**Moved concept from para (25). Simpler and to the point.**	USA
BACKGROUND	[24]	Para	Substantive	**The use of integrated measures must be designed to manage risk from regulated pests. ~~An i~~ The use of integrated measures ~~approach also~~ has the advantage of ~~better~~ managing the risk ~~not only~~ of known regulated pests that are difficult to detect based on export or import inspections ~~but also of~~. It may also reduce overall pest presence, including organisms that are unkown to science contaminating pests, and ~~non-organisms that are not quarantine~~ non- regulated pests ~~in the country of origin~~.**	**According to section 1, establishment of the integrated measures is a bilaterally-agreed, risk-based process, based on the Pest Risk Analysis (PRA) conducted by the importing country. Identification of measures based on this process usually target known, regulated pests. However, provided that they are appropriately applied, the integrated measures proposed in this standard should also reduce the presence of other pests which may not necessarily be known to the importing NPPO and therefore may not be regulated.** **While the IPPC applies to regulated pests only, an integrated measures program offers the additional advantage of reducing overall pest presence. This approach follows the precedent set by ISPM 15. NPPOs may accept the standard as a more effective foundation for addressing both, regulated and the broader threat.**	USA
BACKGROUND	[25]	Para	Substantive	**delete**	**Concept incorporated in para (23).**	USA
REQUIREMENTS	[26]					

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
1. Factors that Affect the Pest Risk of Plants for Planting	[27]					
1. Factors that Affect the Pest Risk of Plants for Planting	[28]					
1. Factors that Affect the Pest Risk of Plants for Planting	[29]					
1.1 Pest factors that affect risk	[30]					
1.1 Pest factors that affect risk	[31]	Add new indent	Substantive	- **Pest seasonality**	**Seasonality of pest populations and life stages is an important factor for consideration during inspections.**	USA
1.1 Pest factors that affect risk	[32]	para	Substantive	**Move to new section 5.3 Risk Management Measures**		USA
1.2 Plant-related factors that affect risk	[33]	Title				
1.2 Plant-related factors that affect risk	[34]	para	Substantive	**~~As part of the risk categorization, t~~ The initial ~~plant~~ risk factors ~~to be~~ considered are associated with plants and will depend the species and area of origin. Within any given species, there is a range of risk associated with the type of plant material moved, as broadly ranked below from lowest to highest risk~~:~~, recognizing that these rankings may vary depending on specific circumstances:**	**Continue as part of section 1.1. Remove the word "risk categorization" to avoid confusion with the term "pest categorization". Risk factors are affected by many variables. For example, under some circumstances, bareroot plants pose less risk than plants in sterile or soilless media (*e.g.* when they have been grown in native soil and are infested by inside pests that cannot be washed off).**	USA
1.2 Plant-related factors that affect risk	[35]					
1.2 Plant-related factors that affect risk	[36]	First sentence	Substantive	**~~Appendix 1,~~ Table 2 in section 2.1 provides examples of possible measures that NPPOs may require for different types of plants for planting and different types or groups of pests associated with them.**	**Consistent with changes in para (46) and (115). Global change.**	USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
1.3 Production factors that affect risk	[37]					
1.3 Production factors that affect risk	[38]					
1.3 Production factors that affect risk	[39]					
1.3 Production factors that affect risk	[40]	Add new sentence at the end Add new para	Substantive substantive	**Water from other sources (e.g. rainfall or standing water) can also be a source of risk.** **Pests that infest or contaminate substrate/bed surface (soil, gravel, or other surfaces under the containers or benches) can subsequently infest plants, growing media, etc.**	**There can be water issues that are not necessarily related to irrigation (*e.g.* rainwater and *P.ramorum)*. It is not always just an irrigation issue. It could also be standing water or water from other sources that can provide a source of phytosanitary risk.** **If the pests of concern are soil or water-borne, recognition of the potential for infestation or contamination of substrate/bed surface, water (in addition to irrigation water), or containers, is vitally important to preventing or managing the diseases of concern.**	USA USA
1.3 Production factors that affect risk	[41]					
1.3Production factors that affect risk	[42]					
1.4 Intended uses that affect risk	[43]					
1.4 Intended uses that affect risk	[44]	Para	Substantive	**As noted in ISPM 32:2009, plants for planting are not processed and since they are intended to remain planted, or to be planted or replanted, their potential to introduce or spread regulated pests is higher. Furthermore, planting (including replanting) may comprise any operation for the placing of plants in a growing medium, or by grafting or similar operations, to ensure their subsequent growth, reproduction or propagation. These may in turn be affected by various consideration, *e.g.* whether plants are**	**The list of examples in the draft standard are not clear, since "continuous growing" is not defined. It may be more consistent to outline this consideration in terms of the ISPM No.5 definitions of "plants for planting" and "planting", which include reference to intended use. The first sentence suggested incorporates wording used in ISPM No.32, Category 4.** **Avoid using high/low risk.**	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
				grown as annuals or perennials, or whether they are grown indoors or outdoors. Plants for planting may therefore be used for various purposes that may also affect risk. ~~Plants for planting are classified in ISPM 32:2009, as a high-risk commodity category. Nevertheless, plants for planting aree used for various purposes that affect the risk. Examples of intended uses are listed below, broadly ranked from lowest to highest risk:~~ ~~- plants not intended for continuous growing~~ - ~~plants for continuous growing~~ - ~~plants for propagation~~		
2. Application of Risk Mitigation Measures	[45]	Title	Substantive	**2. ~~Application of~~ Risk ~~Mitigation~~ Management Measures**	**The term mitigation is not as familiar to many countries. Risk management is IPPC terminology, defined in the Glossary, used in other standards, and easily understood.**	USA
2. Application of Risk Mitigation Measures	[46]	Add new para	Substantive	**Different pest, plant and production factors affect the pest risk of plants for planting and consequently the risk management measures available to reduce pest risk. This section provides options for measures related to pest characteristics that are applicable for most types of plants for planting. Depending on their efficacy, a single such measure may be sufficient to mitigate the risk or a combination of these measures may be incorporated into an integrated measures program.**	**In the draft standard, section 1 outlines the "Factors that affect the pest risk of plants for planting" and section 2, outlines the "Application of risk mitigation measures", which mostly involves administrative procedures. Thus, there is no section integral to the standard that specifically refers to the actual risk management measures that may be considered and applied. These are outlined in the Appendix, but reference to the options of risk management measures should be strengthened. This may be accomplished by 1) adding an Annex into the standard entitled "Risk management measures"; 2) adding a new section in the text with this same title and that more specifically summarizes the measures and refers to the details in Appendix 1; or 3) at least insert the sentences indicated as a new para.**	USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
		para	Substantive	**The strength of risk ~~mitigation~~ management measures applied at the place of production should be consistent with the identified pest risk. The range of posible risk management options constitutes a continuum starting from a single measure (e.g. treatment or inspection) to a comprehensive use of integrated measures ~~approach with numerous elements~~.**	**The term mitigation is not as familiar to many countries. Risk management is IPPC terminology, defined in the Glossary, used in other standards, and easily understood.**	USA
		New subsection Table New subsection table	substantive	**2.1 Risk Management Measures for Different Pest Types** **Move information on table (114) here.** **2.2 Risk Management Measure for Different Types of Plant Material** **Move information on table (115) here.**	**This section is too relevant to the document to keep it separated as an Appendix. By bringing the tables from the Appendix into the document, it makes the standard more useful for NPPOs.**	USA
3. Integrated Measures Approach	[47]	Title	Substantive	**3. Integrated Measures ~~Approach~~**	**Change consistent with comment on title of standard.**	USA
3. Integrated Measures Approach	[48]	para	Substantive substantive	**~~Where individual measures alone are not sufficient to mitigate the pest risk, an integrated measures approach may be implemented.~~ Based on the risk identified this may involve a range of options, from the use of ~~an~~ integrated measures ~~approach~~ whose ~~elements~~ requirements are widely applicable to all plants for planting (see "General integrated measures", section 3.1) to one with additional ~~elements~~ requirements designed to mitigate situations where the pest risk ~~is high~~ rises through a continuum (see "Integrated measures in high-risk situations", section 3.2). NPPOs may consider these options in addition to pre-export or port-of –entry inspections in order to mitigate plant pest risks.**	**We have suggested that a two-tier approach is not sufficiently flexible; that it is better to consider a gradation or continuum of rising risk – with appropriately increased stringency and complexity of the integrated measures program.** **These limitations apply to both export and port-of-entry inspections.**	USA 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
3.1 General integrated measures	[49]	Title	substantive	**3.1 General integrated measures**	**The two-tier approach of "General integrated measures" (3.1) and "Integrated measures in high risk situations" (3.2) does not appear realistic. The PRA-based process proposed in the standard will likely result in a range of estimated pest risks in different situations, with a corresponding range in the stringency and complexity of the risk management measures required. In practice, it would be exceedingly difficult to separate the level of risk into "general" or "high" only, and even "high" risks will vary in different situations. It would therefore be more useful to consider the "general integrated approach" in section 3.1, as the minimum requirement for approaches covered in the standard, whereas varying combinations of "risk-based integrated approaches" in section 3.2, may additionally be required to address specific pest risks. Section 3.1 might be used to outline generally accepted best management practices (BMP) that most production facilities would use to produce a product that would be aceptable on the international market. BMPs usually include: scouting, pest control, sanitation, and other integrated pest management practices.**	USA
3.1 General integrated measures	[50]	Para	Substantive	**Where individual measures alone are not sufficient to mitigate the pest risk, the NPPO of the exporting country may establish integrated measures intended to mitigate pest presence. At a minimum, ~~authorize~~ a place of production authorized to participate in such a program must ~~that~~ compl~~ies~~y with general integrated measures that are applicable to all types of plants for planting and types of pests.**	**We suggest avoiding dividing the program into two tiers because 1) it is too difficult to distinguish "high" from "ordinary" risk, and 2) even "high risk" will vary considerably from one to another. Instead, we suggest providing for a continuum of increasingly stringent measures as justified by increased risk identified through a PRA. NPPOs should incorporate into the systems approach program those components that address the risk. The general integrated mesures**	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
					should also apply to pests as well as types of plants.	
3.1.1 Authorization of places of production	[51]					USA
3.1.1 Authorization of places of production	[52]	para	Substantive		**See comment for para (50). The components contained in para (52) and (53) should be considered the *minimum* components for a program qualifying as a "integrated measures approach" under the terms of the standard. In other words, any "integrated measures approach" program adopted under the standard should mandate these requirements for places of production participating in the program.**	USA
		Last sentence	substantive	**Any failure of products or procedures to adhere to the requirements for authorization (non-compliance) specified in this section or in Appendix 2, "Critical Non-Compliance", should result in the suspension of authorization of the place of production until corrective actions have been successfully completed.**	**Reason for suspension from the program need to be consistently described throughout the standard. Therefore, this section should refer to the "Critical" Non-Compliances specifically rather than to "non-compliance" generally.** **(Note: If Appendix 1 is moved into the text as requested in para 113, 114, and 115, the proposed wording would need to be revised to "Appendix 1" instead of Appendix 2)**	USA
3.1.2 Requirements for the place of production	[53]	Last indent	Substantive	- **Complying with any phytosanitary measures required by the exporting and importing NPPOs.**	**Requirements of the importing NPPO should be provided to the production facility by the exporting NPPO.**	USA
3.2 Integrated measures in high-risk situations	[54]	Title	Substantive	**3.2 Risk specific i~~I~~ntegrated measures ~~in high-risk situations~~**	**The two-tier approach of "General integrated measures" (3.1) and "Integrated measures in high risk situations" (3.2) does not appear realistic. The PRA-based process proposed in the standard will likely result in a range of estimated pest risks in different situations, with a corresponding range in**	USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
					the stringency and complexity of the risk management measures required. In practice, it would be exceedingly difficult to separate the level of risk into "general" or "high" only, and even "high" risks will vary in different situations, and may require varying combinations of integrated measures. It would therefore be more useful to consider the "general integrated approach in Section 3.1 as the minimum requirement for approaches covered in the standard, whereas varying combinations of "risk-based integrated approaches" in Section 3.2 may additionally be required to address specific pest risks.	
3.2 Integrated measures in high-risk situations	[55]	1st row	Editorial	**Where the general integrated measures of section 3.1 are not sufficient to meet the…**		USA
3.2.1 Requirements for the place of production in high-risk situations	[56]	title	substantive	**3.2.1 Requirements for the place of production**	**See comments on para (50) and (54). The specific componenets contained in Sections 3.2.1 subsections 1-8 should be incorporated into specific integrated measures as technically justified through PRA. We anticipate that in many, if not most cases, most of these components would be appropriate for the integrated measures programs.**	USA
3.2.1 Requirements for the place of production in high-risk situations	[57]					
3.2.1 Requirements for the place of production in high-risk situations	[58]					
3.2.1.1 Place of production manual	[59]	Title	Substantive	**Move under new section 4.** **4. Administrative Measures** **4.1 Place of production manual**		USA

1. Section	2. Para nber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
3.2.1.1 Place of production manual	[60]	Para	Substantive	**Move under section 4.1, after para (59)**		USA
		1st sentence	Substantive	**The place of production manual should describe all of the requirements, elements and processes that make up the integrated measures for risk management fo the plants for planting.**	**Global change, where it applies.**	USA
		Last line	editorial	**…an additional audit of the entire programme may not be required.**	**Adds clarity**	USA
3.2.1.1 Place of production manual	[61]	Para	Substantive	**Move under section 4.1, after para (60)**		USA
3.2.1.2 Pest management plan	[62]	title	Substantive	**~~3.2.1.2~~ 3.2.1.1 Pest management plan**		USA
3.2.1.2 Pest management plan	[63]	Add sentence at the end	Substantive	**Table 2 in section 2.1 provides examples of possible measures that NPPOs may require for different types of plants for planting and different types or groups of pests associated with them.**	**We need to reference to Appendix 1 in this section. Wording consistent with comments in para (46) and (115). Global change.**	USA
3.2.1.2 Pest management plan	[64]	1st indent, second bullet	substantive	• **Disinfection of containers for re-use, tools and equipment**	**Re-use of pots is very common and can spread disease.**	USA
		1st indent, 4th bullet	Editorial	• **water ~~treatment~~ disinfestation**	**The term "treatment" is too vague.**	USA
		1st indent, new bullet after wáter treatment	Substantive	• **removal of contaminated substrate/bed**	**Water-borne or soil-borne pests can infest the substrate/bed and result in persistent contamination of the place of production and infection of new plants brought to the site.**	USA
		1st indent, add new bullet	Substantive	• **management of surface water**	**If water-borne pathogens are of concern, elimination of flowing or standing water is key to preventing introduction, persistence, and spread of the pathogen, including infection of plants.**	USA
3.2.1.3 Crop protection specialist	[65]	Title	Substantive	**Move after section 4.1** **~~3.2.1.3~~ 4.2 Crop protection specialist**		USA
3.2.1.3 Crop	[66]	Para	Substantive	**Move under section 4.2**		USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
protection specialist						
3.2.1.4 Training of employees	[67]	title	subtantive	**Move after section 4.2** **~~3.2.1.4~~ 4.3 Training of employees**		USA
3.2.1.4 Training of employees	[68]	Para	Substantive	**Move under section 4.3**		USA
3.2.1.5 Examination of plant material	[69]	Title	Substantive	**Move after section 3.2.1.1** **~~3.2.1.5~~ 3.2.1.2 Examination of plant material**		USA
3.2.1.5 Examination of plant material	[70]	Para	Substantive	**Move under new section 3.2.1.2**		USA
3.2.1.6 Packing and transportation	[71]	Title	Substantive	**Move after new section 3.2.1.2** **~~3.2.1.6~~ 3.2.1.3 Packing and transportation**		USA
3.2.1.6 Packing and transportation	[72]	Para 3rd indent	Substantive substantive	**Move under new section 3.2.1.3** **- each unit of a consignment should be identified in a way that can be traced back to the producer. ~~links it to the consignment and to the phytosanitary certificate.~~**	**Consistent with changes in para (46) and (113). Global change.** **It may be unrealistic to link each plant to the consignment and to the phytosanitary certificate.**	USA USA
3.2.1.7 Internal audits	[73]	Title	Substantive	**Move after section 4.4** **~~3.2.1.7~~ 4.5 Internal audits**		USA
3.2.1.7 Internal audits	[74]	Para	Substantive	**Move under section 4.5**		USA
3.2.1.7 Internal audits	[75]	Para	Substantive	**Move under section 4.5, after para (74)**		USA
3.2.1.7 Internal audits	[76]	Para	Substantive	**Move under section 4.5, after para (75)**		USA
3.2.1.8 Records	[77]	Title	Substantive	**Move after section 4.5** **~~3.2.1.8~~ 4.6. Records**		USA
3.2.1.8 Records	[78]	Para	Substantive	**Move under section 4.6**		USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
		1st para, add 2nd sentence	Substantive	**…when required by the NPPO. The place of production manual should clearly identify individual(s) responsible for maintaining various records, and the location and manner in which such records are maintained. Records for various purposes may be maintained in distinct formats and locations by various responsible individuals. Records that verify compliance…**	**Self-explanatory**	USA
		7th indent	substantive	- **records of pest management measures taken to prevent or control pests ~~(including method of application, product applied, dosage and date of application and resuts of their application)~~**	**In many countries, such information is already included in other reports. Avoid duplication. Also, "results" of the application often cannot be determined until some time after the treatment.**	USA
3.2.2 Non-compliance with requirements for the place of production	[79]	Title	Substantive	**Move after section 4.6** **~~3.2.2~~ 4.7 Non-compliance with requirements for the place of production**		USA
3.2.2 Non-compliance with requirements for the place of production	[80]	Para	Substantive	**Move under section 4.7**		USA
3.2.2 Non-compliance with requirements for the place of production	[81]	Para	Substantive	**Move under section 4.7, after para (80)**		USA
3.2.2 Non-compliance with requirements for the place of production	[82]	Para	Substantive	**Move under section 4.7, after para (81)**		USA
3.2.2 Non-compliance with requirements for the place of production	[83]	Para	Substantive	**Move under section 4.7, after para (82)**		USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
3.2.2.1 Critical non-compliance	[84]	Title	Substantive	**Move after section 4.7** **~~3.2.2.1~~ 4.7.1 Critical non-compliance**		USA
3.2.2.1 Critical non-compliance	[85]	Para Para	Substantive substantive	**Move under section 4.7.1** **Critical non-compliances are incidents that compromise the efficacy of the integrated measures ~~approach~~ utilized at the place of production or increase their risk of infestation ~~of the plants for planting~~. On discovering these critical non-compliances, the NPPO should immediately suspend the authorization for the place of production to export under the use of integrated measures program. (Exports might continue under conditions of inspection and issuance of phytosanitary certificate, if the importing country accepts this). Reinstatement in the integrated measures program should occur only once corrective action has been put into place and an audit by the NPPO of the exporting country had cvonfirmed that the critical non-compliaces have been corrected. The corrective actions may require a change to the integrated measures and should include measures to prevent a recurrence.**	**If the importing country is willing, it may continue to accept plants from a place of production that has been suspended from the integrated measures program under other mechanisms, such as issuance of a phytosanitary certificate after inspection of the outgoing product.** **New wording helps ensure that places of production and exporting country NPPO determine underlying causes of the *critical* non-compliance and rectify them.**	USA USA
3.2.2.2 Non-critical non-compliance	[86]	Title	Substantive	**Move after section 4.7.1** **~~3.2.2.2.~~ 4.7.2 Non-critical non-compliance**		USA
3.2.2.2 Non-critical non-compliance	[87]	Para 1st sentence	Substantive substantive	**Move under section 4.7.2** **Non-critical non-compliance ~~are~~ incidents ~~of non-compliance that~~ do not immediately compromise the ~~integrated measures approach~~ integrity of the plants for planting at the place of production.**	**Reworded for clarity.**	USA 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
3.2.2.2 Non-critical non-compliance	[88]	Para Add new section	Substantive substantive	**Move under section 4.7.2, after para (87)** **4. Administrative Measures**	 **This section will cover the manual, crop protection specialist, training, traceability, audits, records, etc.**	USA USA
4. Responsibilities of the NPPO of the Exporting Country	[89]	Title	Substantive	**Move after section 4** **4 5. Responsibilities of the NPPO of the Exporting Country**	**Exporting and importing countries responsibilities should be in the same area instead of listed far apart. This aligns with other IPPC.**	USA
4. Responsibilities of the NPPO of the Exporting Country	[90]	Para Last indent Add new indent	Substantive Substantive substantive	**Move under section 5, after para (89)** - **providing ~~adequate~~ information to the NPPO of importing countries upon request.** - **approve plant brokers**	 **A statement becomes ambiguous when "adequate" is added because it gives and opportunity to set an artificial threshold. This can have trade implications.** **Those purchasing plants for planting intended for export without growing the plants (referred to as plant brokers), should be approved by the NPPO or its designee.**	USA USA USA
4.1 Establishing integrated measures approaches	[91]	Title	Substantive	**Move under section 5** **~~4.1~~ 5.1 Establishing integrated measures**	**Exporting and importing countries responsibilities should be in the same area instead of listed far apart. The exporting country's responsibilities should not be at the end. This aligns with other IPPC standards and makes the responsibilities of importing countries clear at the beginning.** **Change consistent with the rest of the standard**	USA
4.1 Establishing integrated measures approaches	[92]	Para	Substantive	**Move under section 5.1, after para (91)**		USA
4.2 Authorization of places of production	[93]	Title	substantive	**~~4.2~~ 5.4 Approving ~~of~~ places of production**	**Same title as in 3.1.1**	USA
4.2 Authorization of places of production	[94]			**Move under new section 5.4**		

1. Section	2. Paragraph number	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
4.2 Authorization of places of production	[95]	1st para	Substantive	**Move under new section 5.4** **The authorization of places of production seeking to participate in the ~~integrated measures approach for high-risk situations~~ risk-based integrated measures described in section 3.2 should be based upon:**	**The two-tier approach of "General integrated measures" (3.1) and "Integrated measures in high risk situations" (3.2) does not appear realistic. The PRA-based process proposed in the standard will likely result in a range of estimated pest risks in different situations, with a corresponding range in the stringency and complexity of the risk management measures required. In practice, it would be exceedingly difficult to separate the level of risk into "general" or "high" only, and even "high" risks will vary in different situations, and may require varying combinations of integrated measures. It would therefore be more useful to consider the "general integrated approach in Section 3.1 as the minimum requirement for approaches covered in the standard, whereas varying combinations of "risk-based integrated approaches" in Section 3.2 may additionally be required to address specific pest risks.**	USA USA
4.2 Authorization of places of production	[96]			**Move under new section 5.4**		
4.3 Oversight of authorized places of production	[97]			**3.1.3 Oversight of authorized places of production**		USA
4.3 Oversight of authorized places of production	[98]			**Move under new section 3.1.3**		USA
4.4 Export inspections and issuance of phytosanitary certificates	[99]	Title	Substantive	**Move after section 5.1** **~~4.4~~ 5.2 Export inspections and issuance of phytosanitary certificates**	**Exporting and importing countries responsibilities should be in the same area instead of listed far apart. The exporting country's responsibilities should not be at the end. This aligns with other IPPC standards and makes the responsibilities**	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
					of importing countries clear at the beginning.	
4.4 Export inspections and issuance of phytosanitary certificates	[100]	Para First sentence	Substantive substantive	**Move under section 5.2, after para (99)** **The integrated risk management measures may reduce the need for growing season inspections and intensive export inspections of every individual consignment (if agreed to by the ~~importing~~ NPPO of the importing country).**	**From this sentence and para (105) it would seem that plants could conceivably not have an inspection at export as well as import. While it is noted that waiver of these inspections are at the discretion of the importing country, there is a concen that without inspection, any discovery of non-compliance (*i.e.* pest detection at the importer's facility or a further point of sale) would be hard to trace back to a specific shipment, especially in those cases of large nurseries accepting and transplanting stock from numerous countries. We are concerned that traceability may be more the rule than the exception, and that some countries may use this to justify less inpections for budgetary reasons rather than based on pest risk.**	USA USA
4.5 Providing adequate information	[101]	Title	Substantive	**Move after section 5.2** **~~4.5~~ 5.3 Providing ~~adequate~~ information**	**A statement becomes ambiguous when "adequate" is added bacause it gives and opportunity to set an artificial threshold. This can have trade implications.**	USA
4.5 Providing adequate information	[102]	Para	Substantive	**Move under section 5.3, after para (101)** **Upon request the NPPO of the exporting country should provide ~~adequate~~ information to the NPPO of the importing country to support the evaluation and acceptance of the use of integrated measures ~~approach~~.**	**A statement becomes ambiguous when "adequate" is added bacause it gives and opportunity to set an artificial threshold. This can have trade implications. Change consistent with the rest of the text.**	USA
5. Responsibilities of the NPPO of the Importing Country	[103]	Title	Substantive	**Move after section 5** **~~5~~ 6 Responsibilities of the NPPO of the Importing Country**	**Exporting and importing countries responsibilities should be in the same area instead of listed far apart. The exporting country's responsibilities should not be at the end. This aligns with other IPPC standards and makes the responsibilities**	USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
					of importing countries clear at the beginning.	
5. Responsibilities of the NPPO of the Importing Country	[104]	Para	Substantive	**Move under section 6, after (103)**		USA
5. Responsibilities of the NPPO of the Importing Country	[105]	Para 1st sentence	Substantive substantive	**Move under section 6, after para (104)** **Plants produced using ~~under an~~ integrated measures ~~approach~~ may not require intensive import inspection of every consignment.**	**From this sentence and para (100) it would seem that plants could conceivably not have an inspection at export as well as import. While it is noted that waiver of these inspections are at the discretion of the importing country, there is a concen that without inspection, any discovery of non-compliance (*i.e.* pest detection at the importer's facility or a further point of sale) would be hard to trace back to a specific shipment, especially in those cases of large nurseries accepting and transplanting stock from numerous countries. We are concerned that traceability may be more the rule than the exception, and that some countries may use this to justify less inpections for budgetary reasons rather than based on pest risk.** **Changes consistent with the rest of the text.**	USA USA
5. Responsibilities of the NPPO of the Importing Country	[106]	Para	Substantive	**Move under section 6, after para (105)**		USA
5.1 Traceability procedures	[107]	Title	Substantive	**Move after section 4.3** **~~5.1~~ 4.4 Traceability procedures**		USA
5.1 Traceability procedures	[108]	Para Para	Substantive Substantive	**Move under section 4.4** **The NPPO of the importing country is encouraged to establish procedures that ensure that plants imported under ~~an~~ the use of integrated measures ~~approach~~ can**	**It is realistic to expect such traceability only to the beginning of the supply chain in the importing country.**	USA 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
				be traced ~~back and forward from the importer~~ to the first comercial production site (or first entity who will offer such plants for sale) ~~and that the importer notifies the NPPO of the occurrence of regulated pests and other pests not normally present in the area. This may be accomplished through a registration/authorization process for importers~~.		
		New para	substantive	**The NPPO of the importing country also is encouraged to consider requiring from importers to notify them of the occurrence of regulated pests and other pests not normally present in the area that appear to be associated with recently imported plant material.**	**Detection and reporting of quarantine or "unusual" pests is a desirable component for early detection, but it is separate from traceability.**	USA
5.2 Auditing by the importing NPPO	[109]	Title	Substantive	**Move after section 6** **~~5.2~~ 6.1 Auditing ~~by the importing NPPO~~**		USA
5.2 Auditing by the importing NPPO	[110]	Para	Substantive	**Move under section 6.1, after para (109)**		USA
		Last sentence	Substantive	**This audit may consist of documentation review, inspection and testing of plants produced under the integrated measures approach, and, where appropriate, site visits as mutually agreed by the importing and exporting NPPOs ~~provided that there is justification, *e.g.* in high-risk situation or in cases of non-compliance~~ (see ISPM 20:2004, section 5.1.5 and ISPM 13:2001).**	**Periodical audits and/or site visits by the importing NPPO may be included in bi-lateral agreements between the importing and exporting NPPOs.**	USA
		Add new section	substantive	**7. Plant brokers responsibilities** **Those purchasing plants for planting intended for export without growing the plants (referred to as plant brokers), should be approved by the NPPO or its designee. Approval is conferred by the NPPO or its designee after the**	**Plants that are pest-free when they leave a place of production operating under one of the programs defined by this standard, can become infested while in the custody of a 3rd party – a broker who handles shipments of plants but does not grow plants and so is not covered by the standard as written. To prevent such**	USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
				participant meets the conditions. Approval may be withdrawn if the participant fails to meet the conditions at any time. Plant brokers must ensure the traceability of export consignments to an approved place of production. The broker must maintain the phytosanitary status of the plants in a manner equivalent to an approved place of production from purchase, storage and transportation to the export destination. Plant brokers must document these processes for verifying status and maintaining traceability.	**infestation, maintain the integrity of the program, and ensure rapid determination of the location and source of any problem, brokers should also be subject to the standard.**	
Appendix 1: Examples of pest management measures to reduce the phytosanitary risk of plants for planting	[111]					
Appendix 1: Examples of pest management measures to reduce the phytosanitary risk of plants for planting	[112]			**Delete**	**This section is too relevant to the document to keep it separated as an Appendix. If moved to the main text, it will give the document more clarity and meaning.**	USA
Table 1	[113]			**delete**	**This section is too relevant to the document to keep it separated as an Appendix. If moved to the main text, it will give the document more clarity and meaning.**	USA
Table 1	[114]	Table Pest group 1, 5th bullet	Substantive substantive	**Move under new section 2.1** • **Production within a specified certification scheme or clean stock program that ~~takes into consideration~~ mitigates the pests of concern ot the importing country**	**This section is too relevant to the document to keep it separated as an Appendix. If moved to the main text, it will give the document more clarity and meaning.** **Better wording**	USA 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
		Pest group 6, 3rd bullet	substantive	• **Irrigation water to be disinfected or sterilized before initial use and again disinfected or sterilized before any re-use.**	**If water is recycled/re-used, it should be re-treated before each use in order to prevent pathogens taken up when water ran through containers from being spread to additional containers during the subsequent waterings.**	USA
Table 2	[115]	Table	Substantive	**Move under new section 2.2**	**This section is too relevant to the document to keep it separated as an Appendix. If moved to the main text, it will give the document more clarity and meaning.**	USA
		Table	editorial	**Change numbering on this table.**	**Number 3 did not exist on previous version so all numbers on Table 2 are misnumbered and should go down one. (i.e. 8 is 7)**	USA
		Budwood/ graftwood	substantive	**Bacteria and viruses, fungi, insects and other pests.**	**Fungi are important pests of this group.**	USA
Appendix 2: Examples of non-compliance	[116]					
Appendix 2: Examples of non-compliance	[117]	Title	Substantive	**APPENDIX ~~2~~ 1: Examples of non-compliance**	**Appendix 1 moved into the text.**	USA
Critical non-compliance	[118]					
Critical non-compliance	[119]	6th indent	Substantive	**Move to non-critical non-compliance**	**One mistake on this requirement should not result in supension. A pattern of failing to comply, "repeated" non-compliances, should result in suspension.**	USA
		7th indent	Substantive	**Move to non-critical non-compliance**	**One mistake on this requirement should not result in suspension. A pattern of failing to comply, "repeated" non-compliances, should result in suspension.**	USA
		8th indent	Substantive	**Move to non-critical non-compliance**	**One mistake on this requirement should not result in suspension. A pattern of**	USA

1. Section	2. Paranber	3. sentence/ row/indent, etc.	4. Type of comment (Substantive,Editorial, Translation)	5. Proposed rewording	6. Explanation	7. Country
					failing to comply, "repeated" non-compliances, should result in suspension.	
		9th indent	Substantive	- **Failure to undertake ordered corrective action(s) within the specified time period**	**Correcting problems must be done in a timely manner. Any non-compliance should be completed within specific timeframes after an inspection to allow the place of production to retain its authorization to export.**	USA
		Add new indent	Substantive	- **Failure to maintain sanitation management practices at the place of production**	**Moved from "non-critical" to "critical". Should result in suspension from the program.**	USA
		Add new indent	substantive	- **Failure that plants exported under the program do not meet the standards**	**This should be a critical non-compliance when identified by either the exporting or importing NPPO, based on inspection and testing.**	USA
Non-critical non-compliance	[120]					
Non-critical non-compliance	[121]	3th indent	Substantive	**delete**	**Duplicated in critical non-compliance. Note our addition of "within the specified time period".**	USA
		4th indent	Substantive	- **Failure to ~~prevent the buildup of pest populations~~ maintain an effective pest-management program**	**Pest population build-ups are inevitable at certain times of year – especially if the place of production is relying on integrated pest mangement programs; what is important is that the place of production operate an effective program to restore low pest numbers in a reasonable time period; and take precautions during periods of high pest presence.**	USA
		5th indent	substantive	**Move to critical non-compliace**	**Should result in suspension from the program.**	USA

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. ~~strikethrough~~), 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. Para nber	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 ~~protect plants~~ secure common and effective actions to prevent the spread and introduction of pests of plants and plant products	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 regulated pests.	The scope of the IPPC addresses regulated pests.	COUNTRY NAME
BACKGROUND	[17]	Sentence 4	Editorial	~~Thus~~Additionally, while pursuing the	Clearer wording	COUNTRY NAME
1.4 Supervision activities	[26]	Sentence 3	Substantive	The FF-ALPP programme, including ~~regulatory control~~ domestic regulation	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: 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.	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