

Template for comments - Draft Specifications for member consultation, July 2010

DRAFT SPECIFICATION: *MINIMIZING PEST MOVEMENT BY AIR CONTAINERS AND AIRCRAFT*

Deadline for comments: 13 September 2010

Please use this table for sending comments on Specifications to the IPPC Secretariat (ippc@fao.org). See instructions on how to use this template at the end of the table. Following these instructions will greatly facilitate the compilation of comments and the work of the Standards Committee.

PLEASE ENSURE THAT THE CELL "COUNTRY NAME" IS COMPLETED FOR EACH ROW OF COMMENTS. PLEASE USE ONE TABLE FOR EACH SPECIFICATION.

1. Section	2. Country name	3. Proposed rewording	4. Explanation
GENERAL COMMENTS			
SPECIFIC COMMENTS			
TITLE			
REASON FOR THE STANDARD	USA	<p>Movement of goods and people by aircraft is a significant pathway for the entry of pests. There are numerous examples for the introduction of pests to countries and areas where these pests have not been established before (e.g. recently the introduction of <i>Diabrotica virgifera virgifera</i> into Europe and its spread within). Because of the relatively shorter journey time for relative to the distance travelled, some types of pests may be transmitted easily via air traffic. Some of these pests may already have been regulated by some countries as quarantine pests, while others may not yet have been evaluated in a pest risk analysis but may be potential quarantine pests.</p> <p>Air traffic is highly internationalized and many air companies are active on the global scale. Therefore for many countries it is not feasible to set up specific requirements based on Article I.4 of the IPPC for air containers and aircraft, and a standard is needed to provide guidelines for managing such related phytosanitary risks.</p>	<p>This section is too wordy. The main idea is already contained in the first sentence.</p> <p>This sentence is a bit confusing and unnecessary.</p> <p>editorial</p>
SCOPE AND PURPOSE	USA	<p>In particular The standard will provide guidance for on:</p> <ul style="list-style-type: none"> - identifying particular pest risks associated with air containers and aircraft as pathways between countries - appropriate phytosanitary measures to mitigate such risks, in particular at airports and other places where air containers are loaded - verification of compliance? procedures 	<p>Editorials</p> <p>This indent needs more detail. Verification of what?</p>
TASKS		<p>(1) Consider whether and how the resulting standard could include provide guidelines for minimizing pest movement by aircraft or support their further development</p>	<p>From task (10). This is one of the main purposes of the standard and should be on top.</p>

1. Section	2. Country name	3. Proposed rewording	4. Explanation
		<p>(2) (1) Consider the extent and importance of international pests dispersal caused by air containers and aircraft and identify relevant examples</p> <p>(3) (2) identify the ways that contamination leading to pest risk <u>introduction</u> can occur and note the critical points including issues regarding origin and seasonality</p> <p>(4) (3) identify types of pests that may in particular be transmitted as contaminants by air containers and aircraft</p> <p>(5) (4) identify the most likely places within the aircraft where quarantine pests may be found</p> <p>(6) (5) consider the report of the survey on introduced species by the International Civil Aviation Organization (ICAO) and the guidance developed by that organization and the International Air Transport Association (IATA) standards.</p> <p>(7) (6) review existing international conventions, standards, and industry practices that may be relevant in helping to reduce pest risks from air containers and aircraft internationally and delimit the scope of this standard accordingly</p> <p>(8) (7) identify and describe potential phytosanitary measures and best management practices to reduce pest risks, including:</p> <ul style="list-style-type: none"> - procedures for packing, loading, and cleaning of air containers and aircraft to minimize contamination with pests, including treatment options and safe disposal of contaminants - procedures and practical methods to be taken at airports and other places where air containers are packed or loaded taking into account particular <u>pest</u> risk within the relevant area [e.g. mass development of pests, attractants (light, colour), overwintering aggregation] - measures carried out in the area surrounding airports and where loading and storage takes place <p>(9) (8) describe the distribution of responsibilities among NPPOs, other <u>related</u> organizations and stakeholders</p> <p>(10) (9) consider whether the standard could affect in a specific way (positively or negatively) the protection of biodiversity and the environment, and if so, the impact should be identified, addressed and clarified in the draft standard</p> <p>(11) consider ways for further consultation with and involvement of stakeholders on the subject of this standard during the development of this ISPM</p> <p>(12) <u>describe verification procedures</u></p>	<p>In this instance, it is the introduction of a pest that we are concerned about, not so much the risk.</p> <p>Editorial</p> <p>“Mass development of pests” does not make much sense. Maybe rephrase.</p> <p>Not any kind of organizations and stakeholders</p> <p>This would be an important section in the draft standard</p>
PROVISION OF RESOURCES		<p><i>Comments are not expected on this section unless a country proposes to collaborate by providing funds to cover the cost of the development of the standard.</i></p>	

1. Section	2. Country name	3. Proposed rewording	4. Explanation
STEWARD		<i>Comments are not expected on this section as this is decided by the Standards Committee.</i>	
COLLABORATOR		<i>Comments are not expected on this section unless a country proposes to collaborate by providing funds to cover the cost of the development of the standard.</i>	
EXPERTISE			
PARTICIPANTS		<i>Comments are not expected on this section as this is decided by the Standards Committee. Countries are encouraged to nominate experts when the IPPC Secretariat issues a call for nominations.</i>	
APPROVAL		<i>Comments are not expected on this section as it records the approval process for the specification.</i>	
REFERENCES			
DISCUSSION PAPERS		<i>Comments are not expected on this section as this is standard text used for all specifications.</i>	

INSTRUCTIONS FOR THE USE OF THE TEMPLATE

Comments received on draft specifications will be compiled so that all country comments are together in one table. The tables of compiled comments will be reviewed by the Standards Committee. Following these instructions will greatly facilitate the compilation of comments and the work of the Standards Committee.

Important:

- 1. Each row of the table should contain one comment only. Do not put several comments in the same row. To make several comments on one section, a new row should be added for each comment.**
- 2. Each comment should only contain the text of the modifications made. Do not include sentences or paragraphs for which no modifications are suggested.**
- 3. Do not add or delete columns and do not change their width. Be sure to add the title of the specification at the top of each table. Use one table for each specification.**

EXPLANATION OF THE TITLES OF THE COLUMNS AND THEIR EXPECTED CONTENT:

1. Section: This gives the titles of sections as they appear in the Specification, plus rows for general and specific comments.

- *Each cell in this column should contain a section title.*
- General comments apply to the entirety of the Specification. Specific comments apply to a defined section of the Specification, which should be clearly identified.
- If several comments are made on several paragraphs of the same section, it is suggested that one or several row(s) should be added. The titles of the section should be repeated in the new rows.
- If there is no comment on one section, the other cells in the row should be left empty or the entire row should be deleted.

2. Country name: The name of the country or organization submitting the comments should be indicated in every row for which a comment is being made to facilitate compilation of comments.

- *Each cell in this column should contain the country name.*

3. Proposed rewording: Rewording should always be proposed for any changes thought necessary to the text. As relevant, modifications to the current text should appear as revision marks (i.e. text which is added or deleted should appear in a distinct way from unchanged text, for example text added can be underlined and deleted text can be ~~struck through~~, as suggested on the example below. Suggestions for new paragraphs/indents should be clearly identified as such ("add...").

4. Explanation: This should always be completed if rewording is proposed and should include the justification for the proposed rewording. Such explanations are essential and should be sufficient for the Standards Committee to understand the reasoning behind the suggestion.

EXAMPLE OF A COUNTRY'S COMMENTS AS REVISION MARKS IN THE TEMPLATE

1. Section	2. Country name	3. Proposed rewording	4. Explanation
General comments	Country name	The use of NPPO and contracting parties need to be considered throughout the document and made consistent with the IPPC.	
4.1.2 Measures for imported consignments	Country name	Measures <u>Requirements</u> for imported consignments	Aligns with section 4, 4 th bullet
4.1.2 Measures for imported consignments	Country name	The regulations should specify the <u>requirements (phytosanitary measures)</u> with which imported consignments of plants, plant products and other regulated articles should comply. These measures may be general, applying to all types of commodities, or specific, applying to <u>specified</u> commodities from a particular origin. Measures may be required prior to entry, at entry or post entry. Systems approaches may also be used when appropriate.	1- Align with section 4 and modified heading 2- The commodity also should be specified.
4.1.2 Measures for imported consignments	Country name	documentary ry checks	clarification