

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

DRAFT SPECIFICATION: SYSTEMS FOR AUTHORIZING PHYTOSANITARY ACTIVITIES

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	USA		The U.S. would like the standard to harmonize the use of these three phytosanitary terms: authorization, accreditation, and certification. Some countries use these terms indistinctly; others, differentiate between them. In the U.S., we authorize individuals and entities to do phytosanitary work; we accredit entities capable to perform phytosanitary work, and we certify individuals directly or through an accredited entity to perform phytosanitary work. This standard is a good opportunity to harmonize the use of these terms. Otherwise, it could get more confusing for NPPOs work.
SPECIFIC COMMENTS			
TITLE	USA	Systems for authorizing <u>official</u> phytosanitary activities	Is the NPPO who is authorizing these activities
REASON FOR THE STANDARD			
SCOPE AND PURPOSE	USA	...It will provide guidance <u>to NPPOs</u> on <u>their</u> responsibilities of the NPPO in terms of developing criteria for authorization, assessing compliance, and the granting, removal and reinstatement of authorization. ...Because phytosanitary certificates are issued by authorized public officers only (CPM-4, 2009), <u>this form of the present standard does not include this</u> phytosanitary activity is not to be included in the consideration . <u>This standard may be applied to private and government entities.</u>	Leave no doubt the standard guidelines are written for NPPOs. For clarification This information is not clear in the specification
TASKS	USA	(2) consider the use of “authorize” and similar terms <u>such as, “accredit” and “certify”</u> in adopted ISPMs and how <u>these</u> is related to procedures and requirements outlined in this new standard and provide recommendations to the Standards Committee on that matter. (3) discuss and determine the <u>specific</u> phytosanitary activities that may be performed by authorized entities (e.g. testing, inspection, treatment, etc.) <u>and the specific activities that may not be authorized.</u> (4) discuss <u>define</u> <u>entities</u> and determine the different categories of	To follow up on the explanation given under General Comments. It may be better to state what is not allowed by authorized entities. We need to be clear what we are referring to as entities.

1. Section	2. Country name	3. Proposed rewording	4. Explanation
		<p>entities (e.g. individuals, facilities, business, organizations) that may <u>or may not</u> be authorized</p> <p>(6) prepare guidance on how to determine and list the responsibilities of the NPPO when authorizing/<u>accrediting</u> entities</p> <p>(7) prepare guidance on how to determine and list the responsibilities of the entities being authorized/<u>accredited</u></p> <p>(9) describe the <u>specific</u> requirements, criteria and processes to be put in place for the authorization of entities including granting the authorization, assessment/audit of compliance, <u>suspension</u>, removal and reinstatement of authorization</p> <p>(10) determine and describe the minimum requirements for auditors involved in the delivery of audits at authorized entities. <u>Define who auditors are and their responsibilities.</u></p> <p>(12) describe <u>what training entities would need to get authorized/accredited to perform phytosanitary activities.</u></p>	<p>It would be better to list who cannot be authorized.</p> <p>The expert group should determine the appropriate term(s) to use in the draft standard.</p> <p>The draft needs to address who takes away the authorization/accreditation and who gives it back. Suspension is temporary. Removal could be permanent.</p>
PROVISION OF RESOURCES		<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>	
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