

Template for comments - Draft ISPMs for country consultation, 2004

DRAFT ISPM: GUIDELINES FOR THE EXPORT, SHIPMENT, IMPORT AND RELEASE OF BIOLOGICAL CONTROL AGENTS AND BENEFICIAL ORGANISMS (REVISION ISPM No. 3)

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

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
<i>GENERAL COMMENTS</i>					
<i>SPECIFIC COMMENTS</i>	USA	EDITORIAL	GLOBAL	ADD "COMPETENT AUTHORITY OR" BEFORE "NPPO" THROUGHOUT	FOR CONSISTENCY
TITLE OF THE DRAFT					
INTRODUCTION					
SCOPE					
REFERENCES					
DEFINITIONS	USA	Technical	1. Authority 2. Authority-definition 3. biological pesticide	1. Change to "competent authority" 2. Change government to contracting party 3. Remove the phrase "or a macrobial agent such as a parasitoid or predator" A microbial biological control agent, or a naturally occurring biological substance, mass-produced.....	1. This is used in section 3.1. It is also used in the draft ALPP standard so change for consistency. Also see 4.1. 2. Change for consistency. May need to consult with FAO legal counsel. 3. We do not believe that the definition of biopesticide should include macro invertebrate biological control agents such as parasitoids and predators as they are not applied and/or utilized in a similar manner to chemical pesticides. In addition, OECD guidelines only include microbial control agents in their definition. The other issue deals with registration. In the US once something is termed a pesticide then the product must be registered with the EPA as a pesticide. Pesticide registrations are costly and difficult and most companies would not do it thus the products would not be brought to market.
OUTLINE OF REQUIREMENTS					
REQUIREMENTS					

1. Background				
2. Purpose of the Standard	USA	Editorial	Change second Heading	These are accomplished through:
		Editorial	Dash points	Add an “ing” to the first word of every bullet point
3. Designation of Responsible Authority				
3.1 Contracting parties				
3.2 NPPO responsibilities				
4. Responsibilities of a Contracting Party or, where appropriate, its NPPO prior to Import				
4.1 Responsibilities of the importing contracting party				
4.2 Responsibilities of the authority of an exporting country	USA	Editorial	Change first sentence	The competent authority of an exporting
		Editorial		Delete “to the extent possible”
5. Documentary Responsibilities of Importer prior to Import				Not needed
5.1 General documentary requirements				
5.2 Documentary requirements related to the country of export				
5.3 Documentary requirements related to potential hazards and emergency actions				
5.4 Documentary requirements related to research in quarantine				
6. Responsibilities of Exporter prior to Export				
6.1 General responsibilities of the exporter				

6.2 Responsibilities of the exporter of biopesticides and organisms intended for use for inundative release for phytosanitary purposes					
7. Responsibilities of the NPPO of the Importing Country upon Import					
7.1 Inspection					
7.2 Quarantine					
7.3 Release					
8. Responsibilities of NPPO before and upon Release	USA	Editorial	Title	Responsibilities of the NPPO after release	This section seems to be referring to actions after release
8.1 Monitoring and evaluation					
8.2 Corrective action	USA	Editorial/Technical	Change wording	Where problems are identified (i.e. unexpected deleterious incident), the NAPPO should implement emergency actions or procedures (See section 5.3.2) where appropriate and ensure that all relevant parties are informed	This better reflects what should be done and relates it to a previous section.
8.3 Communication					
8.4 Reporting					
9 Release	Usa	Editorial	Move	Move and renumber as 8.1	We believe the section flows better with this change

INSTRUCTIONS FOR THE USE OF THE TEMPLATE

Tables of comments will be compiled so that all country comments on each section (or even paragraph) will appear together. The compiled tables will be transmitted to the SC (and added to the IPP).

Please do not add or delete columns and do not change their width.

Title of the columns and expected content:

1. SECTION

- This gives the titles of sections as they appear in the draft, plus a row for general comments. If changes are proposed for titles of sections, they should be made in the column "proposed rewording".
- **There should be no empty cell in this 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.
- If several comments are made on several paragraphs of a 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

- To facilitate compilation of comments, the country name should be indicated in every row for which a comment is being made
- **There should be no empty cell in this column.**

3. TYPE OF COMMENTS

For each comment on specific sections of the text, governments are requested to clearly indicate if the comment is considered to refer to:

- a technical/substantive issue with the content of the standard.
- an editorial issue
- a translation issue.

Technical/substantive issue

These are the comments which suggest changes to the meaning of the standard, if the concepts expressed or the technical content is wrong in the view of the country commenting. They cover conceptual problems, scientific errors, technical adjustments etc. Rewording should be proposed and detailed explanations should be given to facilitate understanding and review by the Standards Committee.

Editorial issue

The ideas expressed are thought to be correct, but the wording could be improved (spelling, vocabulary used, grammar or structure of the sentence) to clarify or simplify the text. **The meaning must not be changed.** Examples:

- A term appears in the text and is thought to be needed in the definitions section of the standard.
- A sentence needs to be changed to make it consistent with wording used elsewhere in the text.
- A clearer word which does not change the meaning could be used
- The language used could be simplified

Note: Any change, although minor, which might change the meaning of the text is not editorial and should be classified as technical.

Translation issue

This is limited to points for which the English version is thought to be correct, but appears wrongly translated in the French or Spanish versions. Examples:

- A term of the Glossary used in the English has not been given its proper Glossary equivalent in the language concerned
- A technical term has not been translated with its proper technical equivalent in the plant protection framework.
- A quote from another document should have been taken directly from the document concerned but has been retranslated.

4. LOCATION

The place where the comment applies in the section concerned should be clearly identified. It should refer to the text as circulated for country comments. To facilitate compilation of countries tables, it is suggested that governments refer to titles, paragraphs, sentences, indents with a standard wording to be used as indicated in the table below. Do not use "page" or "line" as these may vary depending on the word processor used. Examples:

Comment regarding	Wording to be used	Further specification of location
Title of the section	Title	
Rewording of the second paragraph of the section	Para 2	
Rewording of the fourth sentence of the 3rd paragraph of the section	Para 3, sentence 4	
Rewording of the 6th indent of paragraph 4	Para 4, indent 6	
Addition of a new indent after indent 2 in paragraph 7	Para 7, indent 2	Add after indent 2: ...
Addition of a new indent after the last of a list	Para 7, last indent	Add last indent
Addition of a new paragraph after paragraph 4	Para 4	Add new paragraph after para 4: ...

5. 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 delete text can be struck-through, as suggested on the example below.
- Suggestions for new paragraphs/indents should be clearly identified as such ("add....").

6. EXPLANATION

This field should always be completed and should include the justification for the comment made. Such explanations are essentials and should be sufficient for the Standard Committee to understand the comment and the proposed rewording.

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

1-Title	2-country	3- Type of comment	4. Location	5. Proposed rewording	6. Explanation
General comments	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	Name	editorial	Title	<u>Requirements for imported consignments</u>	Aligns with section 4, 4 th bullet
4.1.2 Measures for imported consignments	Name	1- editorial 2- technical (or in two rows if more suitable)	Para 1	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. <u>Measures</u> 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	Name	editorial	Para 3, indent 1	documentary checks	clarification
4.1.2 Measures for imported consignments	Name	technical	Para 3, last indent	Add: phytosanitary inspection.	another appropriate option

Deleted: ~~Measures~~

Deleted: measures

Deleted: ~~Measures~~