

Template for comments - Draft ISPMs for country consultation, 2006

**DRAFT ISPM: DEBARKED AND BARK-FREE WOOD**

Please use this table for sending country comments to the IPPC Secretariat ([ippc@fao.org](mailto: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

**Please make sure that the cell "country name" is filled for each row of comments and contains the name of the country submitting the comments**

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
<i>GENERAL COMMENTS</i>					
<i>SPECIFIC COMMENTS</i>					
<b>TITLE OF THE DRAFT</b>					
<b>INTRODUCTION</b>					
SCOPE					
REFERENCES					
DEFINITIONS	USA	Technical/substantive	"bark"	Definition needs to include bark pockets between rings of annual growth, as in revised definition of "bark free wood"	More precise and consistent with other definitions. Refer to the Working Group.
OUTLINE OF REQUIREMENTS					
<b>BACKGROUND</b>					
<b>REQUIREMENTS</b>					
<b>1. General Requirements</b>					
1.1 Regulated commodities	USA	editorial	First dash point	Should read "strand" instead of "stand" (insert an "r")	
1.2 Basis for regulating	USA	technical/substantive	Last paragraph, second sentence	Should include species of pests as well as wood species of concern. Could read "This may be because of the origin (which may be a pest free area), <i>the species of pests present in the area</i> , or the order, genera, etc."	
<b>2. Specific Requirements</b>					
2.1 Debarking					
2.1.1 Debarking tolerances	USA	technical	whole section		It may be useful to establish a definition for

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		technical	second paragraph, first sentence	Revise first sentence to read: “Where debarking is required as a phytosanitary measure, the NPPO may consider a tolerance.”	<p>“tolerance” or include mention of required level of efficacy in discussing requirements for debarking. Saying “required level of efficacy” is more descriptive. Send to Glossary, Working Group, Technical Panel for review.</p> <p>The tolerance level of “10% of total surface area” seems arbitrary. The total amount of bark would be dependent on the actual size of the wood being imported. Very large pieces of wood with up to 10% bark remaining would pose a higher risk than small pieces of wood with the same percentage of bark, relative to the size of the wood. The basis for the amount of bark allowed / tolerated should be based on the risk posed by that wood.</p>
2.1.2 Inspection to verify debarking	USA	technical			The term “majority” should be clarified.
2.2 Bark-free wood					
2.2.1 Bark tolerances for bark-free wood	USA	editorial	First sentence	Delete “generally”	
2.2.2 Inspection to verify the wood is bark-free	USA	technical	second sentence from the last	Revise to read: “However, if a specific tolerance has not been determined, detection of very small pieces...”	The term “infrequent” where it says “...infrequent detection of very small pieces...” is not very clear. How often is “infrequent”? Suggest this should be clarified.
		editorial	3 <sup>rd</sup> sentence	Delete “in general”	
2.3 Responsibilities of the exporting NPPO					
2.4 Non-compliance					
<b>Annex 1</b> Generalized categorization of pests by pest risk associated with the presence of bark	USA	1) technical 2) technical 3) editorial		1) Add an asterisk to “Lepidoptera” 2) In second part of table (removal of bark is not sufficient...), add “Cossidae” 3) Bostrychidae should be spelled Bostrichidae	
<b>Appendix 1</b> Cross-sectional	USA	technical			Drawing should be modified to show bark

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
line drawing of wood					pockets around annual rings
<b>Appendix 2</b> Illustrations of debarked wood					
<b>Appendix 3</b> Illustrations of bark-free wood					

## 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.**
- **The country name should be that of the country submitting the comments**

### 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 <sup>th</sup> 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	<u>documentary checks</u>	clarification
4.1.2 Measures for imported consignments	Name	technical	Para 3, last indent	Add: phytosanitary inspection.	another appropriate option

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