

Template for comments - Draft ISPMs for country consultation, 2004

DRAFT ISPM: GUIDELINES FOR INSPECTION OF CONSIGNMENTS

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>	USA	Editorial	Symbols used in the three figures		Standardized flowchart symbols should be used in the three figures. For instance a flowchart always begins and ends with an OVAL and decisions are DIAMOND shaped, etc.
<i>SPECIFIC COMMENTS</i>	USA	SUBSTANTIVE			SINCE SAMPLING AND INSPECTION ARE SO CLOSELY LINKED, IT MAY BE USEFUL TO DELAY APPROVAL OF THIS STANDARD UNTIL THE SAMPLING STANARD IS DEVELOPED. WE COULD THEN DECIDE IF WE SHOULD COMBINE THE TWO OR KEEP THEM SEPARATE.
TITLE OF THE DRAFT INTRODUCTION					
SCOPE					
REFERENCES					
DEFINITIONS	USA	Technical	New definitions	General inspection – an inspection procedure designed to detect regulated pests when no specified regulated pests have been identified. Specific inspection – an inspection procedure designed to detect specified regulated pest to meet phytosanitary requirements.	The terms “general inspection” and “specific inspection” are used in the text and in the figures, but no guidance is provided on what they really mean. The definitions will provide additional clarity.
OUTLINE OF REQUIREMENTS					
REQUIREMENTS					
1. General Requirements					
1.1 Inspection of consignments					
1.2 Responsibility for inspection					

1.3 Inspectors	USA	Substantive	Delete 7 ^h dash mark	Delete “no conflict of interest”	ISPM 20, 5.1.5.2 states that “phytosanitary inspections should be carried out by, or under the authority of, the NPPO. Section 5.1.7 provides guidance for the authorization of non-NPPO personnel to conduct certain NPPO functions. No mention is made of restrictions on such personnel. While stating that there should be no conflict of interest seems reasonable, it could unjustifiably limit the authorization or accreditation of personnel who work for private companies to conduct such work. Many countries already use personnel in this manner. The key issue is the issuance of phytosanitary certificates. These must only be issued by official government personnel. Private companies that may have a conflict of interest should not be excluded since strict accreditation procedures should preclude problems. No restrictions of this nature are used anywhere else in IPPC documents.
1.4 Inspection objectives and assumptions	USA	<p>Editorial</p> <p>Editorial</p> <p>Substantive</p>	<p>Third paragraph, second sentence</p> <p>8th paragraph</p> <p>Last paragraph, 2nd sentence</p>	<p>Change to read, “In cases of repetitive non-compliance, additional phytosanitary measures may be considered including the increase of the intensity and frequency of import inspections.....”</p> <p>Delete the first sentence and combine the rest of the text with the last bullet point in paragraph 7.</p> <p>Change to read, “Sampling involves a statistical relationship between the lot size, sample size, confidence level and the <u>amount of pests or</u> infestation prevalence that may be detected in a lot.</p>	<p>The “level of prevalence” is what is in a population and is continuous (0 – 100%). Detection is either absent or present (one or more pests). This whole paragraph is trying to reduce the description of a sampling scheme down to one simple paragraph. This can’t be done and it could cause much confusion. Therefore, it may be best to delete the paragraph and wait for the Sampling Standard to explain in detail. At the minimum, change the wording as suggested.</p>

1.4.1 Probability of pests being undetected	USA	Substantive	First paragraph, 4 th sentence	Delete the sentence, "This tolerance is equivalent to a detection threshold." Replace with, "The finding of one or more pests in a sample may not necessarily be a reason for rejection of the shipment since the amount may still be within the tolerance allowed for the pest."	This is really not true. This assumes that inspection consists of an acceptable sampling scheme in which a consignment is rejected if any number (one or more) of a specific pest is detected. However, the detection of just one pest is not (or should not) necessarily be the trigger for regulatory action. Also, tolerances that are verified by visual inspection may take other forms (i.e. certain number of leaves per fruit carton or certain amount of bark on a piece of wood). It may be better to give a more detailed description of "detection threshold" in the standard for sampling.
1.5 Other factors					
1.6 The relationship of pest risk analysis to inspection					
2. Technical Requirements	USA	Editorial	Title	Since #1 is termed "General Requirements" suggested #2 be termed "Specific Requirements"	
			Second paragraph	Move to 2.3	
2.1 Review of documents associated with the consignment					
2.2 Checking consignment integrity					
2.3 Phytosanitary inspection of the consignment					
2.3.1 Checking for phytosanitary compliance					
2.3.2 Visual inspection for pests and/or sampling for testing					
2.4 Inspection technique					
2.5 Inspection outcome					
2.6 Review of inspection programmes					
2.7 Transparency					
Figure 1: Relationship of pest risk analysis to inspection					

Figure 2: Import inspection process					
Figure 3: Export inspection process	USA	Editorial	In square box with numbers	Change #3 to "Phytosanitary Inspection"	This aligns with 2.3 of the standard.

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: ~~Me~~

Deleted: easures

Deleted: ~~tion~~