

Template for comments - Draft ISPMs for country consultation, 2006

DRAFT ISPM: PHYTOSANITARY TREATMENTS FOR REGULATED PESTS

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

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>					
TITLE OF THE DRAFT					
INTRODUCTION					
SCOPE	USA	technical	First sentence	“This standard presents criteria for submission of efficacy data on treatments so that they can be internationally recognized for use by NPPOs to meet their phytosanitary requirements.”	
		editorial	Third paragraph	Delete “and used” so sentence reads “This standard applies to treatments for regulated pests on plants, plant products...”	
		editorial	Fourth paragraph	Delete “or other internal requirements for approval of treatment measures (e.g. irradiation).”	
REFERENCES					
DEFINITIONS	USA	technical	Treatment schedule	Suggest modifying definition to read “The aspects of a treatment that are critical to achieving the required level of efficacy”.	
OUTLINE OF REQUIREMENTS	USA	editorial	First sentence	Rewrite to read “Phytosanitary treatments may be used by contracting parties as phytosanitary measures to prevent the introduction and spread of regulated pests”	For clarity
	USA	technical	Third paragraph, 2 nd to last sentence	Delete “and should be applicable to use of the treatment internationally.”	A treatment that works for one country may not be applicable to all countries, but should be considered nonetheless.

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BACKGROUND					
REQUIREMENTS					
1. Criteria for Treatments	USA	technical	Second sentence	Add the word phytotoxicity: "...such as phytotoxicity and the effects on human health and safety, animal health, phytotoxicity and the environment..."	May also be useful to take into account phytotoxicity data.
2. General Requirements for Phytosanitary Treatments	USA	editorial	2 nd dash point	Reword "statistically sound" to say "statistical methods"	More technically correct
3. Specific Requirements for Phytosanitary Treatments					
3.1 Summary information	USA	technical	4 th dash point	Add "commodity" in parenthesis: (...treatment schedule, commodity, other information)	Useful information in summary information.
3.2 Efficacy data in support of the submission of a phytosanitary treatment					
3.2.1 Efficacy data under laboratory/controlled conditions	USA	technical	First paragraph, Second sentence	Add "when that life stage is associated with the commodity".	The most resistant life stage of some pests may not in fact be associated with the commodity. It is only necessary to test for most resistant life stage for those pests that are associated with the commodity in that life stage.
		technical	"commodity / regulated article information". First dash point	Add at the end of the sentence: "The requirements for varieties testing should be based on evidence to support the requirement. "	Varietal testing is not always necessary; this should be clarified.
		technical	"experimental parameters", first dash point	In parentheses add "pest/commodity units" instead of "subjects"	More descriptive
3.2.2 Efficacy data using operational conditions	USA	technical	First dash point	Add inside parenthesis "culling"	
3.3 Information on commercial feasibility and	USA	technical	First sentence	Delete this sentence.	It is not necessary

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
applicability	USA	technical	First dash point	Add “facilities needed” after “includes ease of use...”	Facilities should also be considered
		technical	Add dash points	“availability of treatment”, “application to other commodity / pest combinations, if known”, “phytotoxicity and effects on commodity quality.”	Useful information
4. Evaluation and Publication of Phytosanitary Treatments					
Annex 1 Approved phytosanitary treatments					
Annex 2 Information required for submission of a phytosanitary treatment	USA	technical	Under Treatment description, target pest(s)	Where it says “taxonomic information” say instead “scientific name”	More clear
Appendix 1 Criteria for prioritizing and evaluating submitted information on phytosanitary treatments					

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	Requirements for imported consignments	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

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