

International Standards for Phytosanitary Measures  
Guidelines for the Preparation of Regulated Pest Lists

United States Comments  
(October, 2000)

General

Although the US would not oppose adoption of the standard as currently written, we request the following to be considered for clarification purposes.

We had a question concerning the use of import permits in relation to pests listed on a Regulated Pest List. There are two schools of thought here. Some believe that an import permit provides the specified phytosanitary requirements, which includes all the requirements for pests for a specific importation. Others believe that while the import permit lists the most important pests of concern, the commodity should still be visually examined to determine the presence of other pests as listed on a regulated pest list. If they are present, the commodity should not be certified unless it is rendered free of these pests.

We are also under the assumption that pests specified for a given commodity, as listed in a country's regulations, are the only pests that need to be considered when certifying a commodity. We also assume that if during a visual inspection another pest is found then the general pest list must be checked to determine if the pest is listed..

We would like to clarify the issue of how import permits and published country regulations tie into the use of regulated pest lists, but it does not seem to fit into any current or draft standard. We thought it may be useful to include a new section in this standard to address the issue. We suggest that a new point be inserted under General Requirements - 7. The use of import permits and published regulations in relation to regulated pest lists.

Specific

**GENERAL REQUIREMENTS**

2. Necessity for lists of regulated pests

Last paragraph, last sentence - it is not clear what is meant by the statement "to certify based on known requirements". Suggest that the wording from the draft standard, "Guidelines for Phytosanitary Certificates" be used. The wording is, "In instances where import requirements are not specific and/or quarantine pests are not specified, the exporting country can certify for any pests believed by it to be of regulatory concern." We would assume this certification would be satisfied by issuing the certificate and not by the inclusion of additional declarations. Even though this may seem contrary to the requirement to list pests, it may take some time for some countries to develop pest lists. However, an exporting country still has an obligation under the dictates of the IPPC to try to prevent the international spread of plant pests.

## 6.1 Phytosanitary actions for listed pests

First sentence, delete “technical” and “or for any other reason”. If it is justified then what other reasons would there be to take action? Justification could be for instance, the people of their country are starving so they are going to ignore the detected pests. The term “justified” covers whatever case may arise, technical or not.

## 6.2 Phytosanitary actions for pests not included on general lists of regulated pests

Last paragraph, last sentence, end the sentence after “.....regulated pests. A list is not going to have the justification for every pest put on that list. This information will be listed in PRAs or data sheets. Suggest adding another sentence which reads, “Upon request, NPPOs should provide information on the basis for requiring action on such pests specifying identification problems associated with these pests.”

Add the following new section:

## 7. The use of import permits and published regulations in relation to regulated pest lists

### 7.1 Import Permits

If import permits are used to allow the importation of commodities they should clearly state the requirements in relation to regulated pests. However, it is expected that if during a visual inspection in an exporting country, another pest is found and is listed on the general pest list, then the commodity can not be certified unless it is rendered free from the pest.

### 7.2 Published Regulations

When regulations are published or listed for specific commodities they should cover all the primary pests which the exporting country is expected to certify freedom from. However, it is expected that if during a visual inspection in the exporting country, another pest is found and is listed on the general pest list, then the commodity can not be certified unless rendered free from the pest.

## **SPECIFIC REQUIREMENTS**

### 2.1 Minimum information

*Level of specificity -*

To help clarify what this section means it may be useful to add, “(e.g. races of pathogens , pathovars, subspecies, etc.)”