

Template for comments - Draft ISPMs for country consultation, 2004

DRAFT ISPM: GUIDELINES FOR CONSIGNMENTS IN TRANSIT

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>					
TITLE OF THE DRAFT					
INTRODUCTION					
SCOPE	USA	Editorial	Add wording after "regulated articles"	"and /or regulated organisms"	Includes biocontrol organisms
REFERENCES					
DEFINITIONS					
OUTLINE OF REQUIREMENTS					
REQUIREMENTS					

<p>1. Background</p>	<p>USA</p>	<p>Substantive/technical 1</p>	<p>Revise paragraphs 2, 3, and 4</p>	<p>A consignment which enters the territory of a country, passes through it and entirely leaves is considered to be in transit. Such consignments are generally subject to Customs control. They may pass in this way while remaining enclosed, and without being split up, combined with other consignments or having their packaging changed. Under such conditions, they can in many cases move without special phytosanitary measures, especially if they are transported in containers. The Customs procedures adequately ensure the integrity and security of the consignment, and in particular the fact that they finally leave the country intact.</p> <p>However, there are instances when some consignments may be passing through a country in transit under customs control and their enclosure may only satisfy Customs requirements and not phytosanitary requirements. They also, may not pass directly through the country, but be held for a period of storage under Customs control. In such cases, the consignments may present a phytosanitary risk to the country of transit and phytosanitary measures may be needed which go beyond the Customs control system.</p> <p>This standard is concerned both with consignments passing through countries under Customs control only, and with consignments subject to additional phytosanitary measures while in transit (e.g., some transit country NPPOs require prior approval via a transit permit which lists stipulations). In all cases, cooperation between Customs and the NPPO is essential for implementation of an effective transit system.</p>	<p>The wording is clearer and better reflects what actually happens in practice.</p>
<p>2. Phytosanitary Risk Assessment for the Country of Transit</p>	<p>USA</p>	<p>Editorial</p>		<p>Change to, "Phytosanitary Risk Determination for the Country of Transit"</p>	<p>This might be useful to use the term "Determination" instead of "Assessment" so as not to confuse this process with a Pest Risk Assessment. It appears that a Phytosanitary Risk Assessment is a new process. There could be a lot of confusion between this and a Pest Risk Assessment.</p>

2.1. Information required for hazard identification	USA	Editorial S/T Substantive	Last paragraph, delete the last sentence Add a new dash point	Change to read "Hazard identification" - conditions of transport (refrigeration, modified atmosphere, etc.)	The process of phytosanitary risk determination (or assessment) is described in 2.1, 2.2, and 2.3
2.2 Information required for risk categorization	USA	Editorial Substantive Add 3 new dashes Add 2 sub dashes under "pest regulated by country of transit"	Revise 1 st paragraph	Change to read "Risk categorization" The risks associated with any phytosanitary hazards identified in the points listed in Section 2.1 should be categorized. Since these risks will be associated with a pest, a pest risk assessment should be conducted (ISPM No. 2: Guidelines for pest risk analysis). A full risk assessment is not usually necessary for articles transiting a country. - Ability to enforce transit requirements and track shipments - if the container or other mode of transport will return contaminated with quarantine pests - environmental conditions of the area being transited - - description of the pest, with special emphasis on temperature impacts and survival along the pathway, if available - - dispersal mechanisms for the pests with special emphasis on the identification of wind-borne organisms as well as highly mobile pest.	The standard is using the IPPC PRA model for phytosanitary risk assessment. This makes the wording and meaning very confusing. The suggested modification will hopefully correct this.
2.3 Phytosanitary risk classification of consignments in transit	USA	Editorial Substantive	Delete "of consignments in transit" Modify the sentence	The phytosanitary risk can be classified into two broad categories: handled by Customs procedures only; or requiring NPPO intervention.	This aligns the wording of the three points This makes it clear that there are only two categories
3. Phytosanitary Risk Management for Consignments					

3.1 Transit under Customs procedures alone	USA	Editorial	Delete the word "alone"		The original wording is not good English
3.2 Transit with phytosanitary measures in addition to Customs procedures	USA	Editorial	Change wording of first sentence	If the phytosanitary risk determination for consignments.....	Changed for consistency
		Editorial	Change 8 th dash mark	- Customs facilities designated by the NPPO	
3.3 Prohibition of transit					
3.4 Rejection from transit procedures	USA	Editorial	Add additional examples	(e.g. rejection, treatment, re-export)	Giving rejection as the only option seems limiting
4. Responsibilities	USA	Substantive	Add a new point – 4.3	4.3 Any diversion or unauthorized deviation from transit stipulations (e.g. the transit corridor) must be communicated to the NPPO of the country of transit as soon as possible.	
4.1 Responsibility of national government					
4.2 Responsibility for consignments transiting a country					
5. Emergency Measures for Transit					
6. Resources	USA	Editorial	Delete		This is of course true for every measure or procedure in every standard. Don't think it is necessary here.

<p>7. Phytosanitary Risks for Importing Country Arising from Transit</p>	<p>USA</p>	<p>S/T</p>	<p>Revise 2nd paragraph</p>	<p>If, however, the consignment is infested or contaminated by pests, and the country determines that the transit could present an immediate danger to the importing (destination) country due to these pests, this information should be communicated to the importing country (ISPM No. 17, Pest reporting).</p> <p>If the consignment is split up, combined with other consignments or repackaged, the NPPO should not issue a phytosanitary certificate for re-export (ISPM No. 12, guidelines for phytosanitary certificates) unless the commodity has officially entered commerce in the intermediary country. If the commodity has not officially entered commerce in the intermediary (transit) country (i.e. under Customs control), the consignment may not be eligible for a phytosanitary certificate for re-export because many transiting country NPPOs lack authority to legally issue or use this document for consignments that do not officially enter their country's commerce.</p>	<p>These changes clarify when a phytosanitary certificate for re-export can be issued.</p>
<p>8. Cooperation and Communication</p>					
<p>9. Non-discrimination</p>					
<p>10. Review</p>					
<p>11. Documentation</p>					

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

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