

Template for comments - Draft ISPMs for country consultation, 2004

**DRAFT ISPM: REQUIREMENTS FOR THE ESTABLISHMENT, MAINTENANCE AND VERIFICATION  
OF AREAS OF LOW PEST PREVALENCE**

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

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	1. USA  2	Editorial  Technical		Add definition of “competent authority” as per ISPM 3 revision document. See definition of ALPP.  Add definition for “Workplan” – an official document specifying the phytosanitary measures agreed to by the National Plant Protection Organizations of both importing and exporting countries, intended to prevent the movement of regulated pests while facilitating trade of plants and plant products.	
OUTLINE OF REQUIREMENTS					
<b>REQUIREMENTS</b>					
<b>1. Background</b>					
1.1 Description of an area of low pest prevalence (ALPP)					
1.2 Benefits of areas of low pest prevalence					
1.3 Distinction between a pest free area and an area of low pest prevalence	USA	Technical	Addition to last sentence	After “its distribution I the country” add “factors that determine this distribution”	Provides additional guidance
1.4 Bilateral operational plans	USA	Technical	Title and Text	Change “operational plans” to “work	This is a more widely accepted term

				plans”	
<b>2. Specific Requirements</b>					
2.1 Establishment of an ALPP					
2.2 Geographic description	USA	Technical	Add 2 sentences at end of paragraph	A natural barrier should be justified by documentation on how effective it is at controlling the pest. The size and configuration of the buffer should be justified by documentation on how effective it is at controlling the pest.	
2.3 Quality management system					
2.4 Phytosanitary procedures	USA	Editorial	Addition to second paragraph	“Surveillance data should be collected, analysed and documented to .....	Addition shows the process
2.4.1 Surveillance activities	USA	Technical	Addition to 1st paragraph	The NPPO where the ALPP is located should establish threshold levels defining low prevalence for the specified pest(s) with sufficient precision to allow importing countries to assess whether surveillance data and protocols are adequate to determine that pest prevalence is below the threshold(s).	This provides more guidance to the user as to why it is important to clearly define the threshold levels.
		Technical	Change the 2nd paragraph, first sentence  Add to the end of the 3 <sup>d</sup> paragraph	.....appropriate periods of time and at a level of sensitivity that is likely to detect the specified pest(s) at the specified threshold with an appropriate level of confidence.  , and should be statistically validated to detect and characterize the population levels of the pest.	
2.4.2 Reducing pest(s) levels and maintaining low prevalence	USA	Technical	Add to the end of the 2 <sup>nd</sup> paragraph	, with the understanding that presenting a single year of data does not provide high certainty of the success of the proposed ALPP.	
2.4.3 Reducing the risk of entry of specified pest(s)	USA	Technical	Add another sentence to the end of the 1 <sup>st</sup> dash.	All pathways of the pest into and out of the ALPP should be identified.	
2.4.4 Emergency action plan	USA	Technical	Add another sentence to end of the paragraph	Corrective actions should address all of the pathways.	
2.5 Verification of an area of low pest prevalence	USA	Technical	Delete “requirements” and	.....verify that the measures required to meet the ALPP are in place.	The actual measures taken should be verified not the requirements

			add new wording		
<b>3. Maintenance of an Area of Low Pest Prevalence</b> <b>4. Change in the Status of an Area of Low Pest Prevalence</b> <b>5. Reinstatement of the Status of an Area of Low Pest Prevalence</b>  <b>Appendix 1</b> Elements required for establishment of an ALPP for some insects	USA	Technical	<p>Modify the 3<sup>d</sup> sentence</p> <p>Add a new 4<sup>th</sup> sentence</p> <p>Add new sentence after the 4<sup>th</sup> sentence</p>	<p>The suspension of the ALPP will remain in effect until it is demonstrated that populations remain below the specified threshold level for an appropriate period of time or that the other deficiencies have been corrected.</p> <p>As with the initial establishment of an ALPP, the minimum period of time below the threshold prevalence level for reinstatement of ALPP status will depend on the biology and ecology of the specified pest(s).</p> <p>After reinstatement the NPPO should conduct normal establishment/maintenance ALPP activities</p>	This sentence completes the process
	USA	Editorial	<p>#1, 2<sup>nd</sup> dash, add a phrase</p> <p>3<sup>rd</sup> dash</p> <p>4<sup>th</sup> dash</p> <p>#2, 3<sup>d</sup> dash</p> <p>10<sup>th</sup> dash</p>	<p>Places of production of host crops</p> <p>Natural barriers (should include biological justification such as studies, records, literature, as to how they serve as a barrier to the pest species)</p> <p>Buffer zone (should include biological justification including why a barrier width was chosen)</p> <p>Reporting of surveillance results (should include comparisons between results of surveys within and outside the ALPP)</p> <p>Host or commodity sampling (host status needs to be precisely qualified and justified)</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 <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	documentary <del>checks</del>	clarification
4.1.2 Measures for imported consignments	Name	technical	Para 3, last indent	Add: phytosanitary inspection.	another appropriate option

Deleted: ~~Measures~~

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