

Template for comments - Draft ISPMs for country consultation, 2004

DRAFT ISPM: AMENDMENTS TO ISPM NO. 5 (GLOSSARY OF PHYTOSANITARY TERMS)

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> | | | | | |
| 1. REVISION OF EXISTING TERMS | | | | | |
| 1.1 Linked to the use of "phytosanitary" | | | | | |
| Additional Declaration compliance procedure (for a consignment) | | | | | |
| detention | | | | | |
| Import Permit | | | | | |
| systems approach(es) | | | | | |
| 1.2 Two terms using "phytosanitary regulation or procedure" | | | | | |
| emergency measure | USA | Substantive | The second part | Such measures are provisional unless an evaluation indicates that continuance is justified. | The second part of the definition seems to be in conflict with Article VII.6 of the revised Convention as well as with the WTO SPS Agreement Article 5.7. Both envisage emergency measures as temporary and transitional. Extending or making permanent emergency measures require a technical justification . |
| phytosanitary action | | | | | |
| 1.3 Use of "official" | | | | | |
| chemical pressure impregnation | | | | | |
| heat treatment | | | | | |
| phytosanitary procedure | | | | | |
| treatment | | | | | |

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|--|-----|-----------|-------------|--|--|
| 1.4. Proposed agreed interpretations establishment introduction | | | | | |
| 2. PROPOSED NEW TERMS | | | | | |
| 2.1. Arising from countries' suggestions during country consultation on draft standards in 2003 | | | | | |
| integrity (of a consignment) | USA | Technical | New wording | The status of the physical attributes of a consignment (e.g. volume, amount, or seals on a container) as described by a phytosanitary certificate or other document. | The physical attribute component if very important. This is well described in Section 2.2 of the draft standard on Inspection of Consignments. |
| security (phytosanitary) | USA | Technical | New wording | Maintenance of the phytosanitary status of a consignment by using the appropriate phytosanitary measures. | In this case security refers to the phytosanitary security and not the physical security. Physical security or integrity is covered in our proposed definition of "integrity". It is possible to maintain the integrity (i.e. volume, amount) as described by documents but not maintain the phytosanitary security. The new terms now cover both. |
| pest risk assessment (for regulated non-quarantine pests) | | | | | |
| pest risk management (for regulated non-quarantine pests) | | | | | |
| phytosanitary import requirements | USA | Editorial | Needed? | | The definition seems to state the obvious so we question if this definition is needed. |
| prevalence (pest) | USA | Technical | New wording | Level of pest infestation in a host population at a given time and in a given area. | The use of the words "proportion" and "units" seems unnecessarily vague. |
| tolerance | | | | | |
| 3. TERMS ARISING FROM ICPM-5 | | | | | |
| ecosystem | | | | | |

| | | | | | |
|---|-----|-----------|----------------------------|--|--|
| habitat | USA | Technical | New wording | The type or part of an ecosystem where a species occurs naturally or where it can become established. | |
| 5. PROPOSED DELETIONS OF TERMS | | | | | |
| ecoarea quarantine (of a biological control agent) | | | | | |
| contaminating pests | USA | Technical | Propose we keep definition | Even though not used in a standard this is a very useful definition in the area of plant protection. It also helps to clarify the term "hitch hiker" which is a colloquialism often used. This term is useful for risk assessors when they want to refer to infrequently intercepted quarantine pests that may, but are not likely to, reliably follow a pathway on a commodity without causing harm to those plant or plant products. | |

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 essential 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 Deleted: ¶ |
| 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. Deleted: casures |
| 4.1.2 Measures for imported consignments | Name | editorial | Para 3, indent 1 | documentary v checks | clarification Deleted: tion |
| 4.1.2 Measures for imported consignments | Name | technical | Para 3, last indent | Add: phytosanitary inspection. | another appropriate option |