

Template for comments - Draft ISPMs for country consultation, 2005

**DRAFT ISPM: REQUIREMENTS FOR THE ESTABLISHMENT AND MAINTENANCE OF PEST FREE AREAS FOR TEPHRITID FRUIT FLIES**

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

**Please make sure that the cell "country name" is filled for each row of comments**

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
<i>GENERAL COMMENTS</i>	USA	Technical		The issue of transient detections should be addressed, including that in general the detection of transient flies does not necessarily trigger action but may require increased surveillance.	
<i>SPECIFIC COMMENTS</i>					
<b>TITLE OF THE DRAFT</b>					
<b>INTRODUCTION</b>					
SCOPE					
REFERENCES					
DEFINITIONS	USA	Technical	"Detection"	Detection: the discovery of a target pest	1. Delete "a specimen of the", not necessary. 2. There are two different definitions for "detection", in this draft standard and the draft diagnostic protocol standard
OUTLINE OF REQUIREMENTS					
<b>BACKGROUND</b>					
<b>REQUIREMENTS</b>					
<b>1. General Requirements</b>					
1.1 Buffer zone					
1.2 Public awareness					
1.3 Documentation and review					
1.4 Record keeping					
1.5 Quality assurance programme	USA	Editorial	First para		"...planning should comply with approved procedures". Does this refer to procedures

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		Technical	Add another sentence to the first para	The procedures should be documented through written guidelines or quality control manuals and activities recorded on report forms that are maintained for review by trading partners.	approved by both the importing and exporting countries? This guidance would be useful.
<b>2. Specific Requirements</b>					
2.1 Determination of the FF-PFA					
2.2 Establishment of the FF-PFA					
2.2.1 <i>Surveillance activities for establishment</i>	USA	Technical	First paragraph, 3rd sentence	Change to read, “However, sometimes fruit sampling activities may be required to complement the trapping program.	It should be clear that fruit sampling is an optional supplement to trapping for the establishment and maintenance of pest free areas and not an obligation. For those species responsive to specific lures it may be useful for this section to point to the IAEA guidelines and if a particular species or genera is listed with a recommended trap/lure combination then trapping alone would be adequate for the establishment of pest free areas. If the species or genera is not listed then fruit sampling must accompany any trapping. In general, trapping is far superior in finding adults than fruit cutting is in finding other life stages
		Technical	Second paragraph, second sentence	Change second sentence to read, “There should be no <u>populations detected</u> etc. ....” Add, “A single adult detection should not disqualify an area. In most cases, a ‘trigger’ level must be reached before the status is affected. Also, as with temperate fruit flies with a single generation per season and a relatively narrow host range, a single adult detection should not impact the free zone status but should be followed by fruit survey. In such cases, the detection of more than one life stage should be the trigger that would affect the status of the free zone. “	The sentence reads, “There should be no detections (adult or immature stages) of the target species during the survey period.” This is not normally how systems work because you have to allow for a transient detections. Also, this is not the norm and is not practical or reasonable for temperate fruit flies with a single generation per season and a relatively narrow host range. In such cases a single adult detection should not impact the free zone status, but the detection is followed up by a fruit survey. In such cases, the detection of more than one life stage should be the trigger that would affect the status of the free

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					zone.
2.2.1.1 <i>Trapping procedures</i>	USA	Technical	Preferred host(s)		In sampling fruit, fruit at the maturity level at harvest should be sampled.
		Technical	“	Add another sentence. “Countries should have well developed host lists for targeted fruit fly species based on primary, secondary and tertiary ratings of preference.	This information is important in trap placement
		Technical	Trap inspection		The frequency at which traps are checked will depend on the type of trap used and the physical condition of the flies in the trap (and whether they are able to be identified). In certain traps, specimens may degrade quickly making identification difficult or impossible unless the traps are checked frequently.
		Technical	Record Keeping	Add, “Trap route records should be maintained by each surveyor either by paper records or electronic hand held devices. This is a critical component of any quality control program.”	
		Technical	Identification	Change “in an expeditious manner” to “within 48 hours”.	This is essential.
2.2.1.2 <i>Fruit sampling procedures</i>	USA	Technical	First paragraph	“Fruit sampling may compliment trapping procedures in some cases in establishing a FF-PFA.”	This compliments the changes in 2.2.1 and provides guidance that sampling is not useful or mandatory in all cases in establishing at FF-PFA. This should not be mandatory.
2.2.2 <i>Regulatory controls on the movement of host material or regulated articles</i>	USA	Editorial	End of first sentence	Add “of the pest free area.” To end of sentence so it reads “...of target pests into the FF-PFA during the establishment phase of the pest free area.”	Avoid confusion with the term “establishment”.
		Technical	New dash point	Quarantine stations are necessary to	This is an important factor.

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				prevent infested material from entering the area especially when other infested areas are within the country or close to the proposed free area.	
<i>2.2.3 Additional technical information for establishment</i>					
2.3 Verification and declaration of pest freedom					
2.4 Maintenance of the FF-PFA					
<i>2.4.1 Surveillance for maintenance of the FF-PFA</i>					
<i>2.4.2 Regulatory controls on the movement of host material and regulated articles</i>	USA	Editorial		Should say "(See section 2.2.2)" instead of "(See section 3.2.2)"	
<i>2.4.3 Corrective actions (including response to an outbreak)</i>					
<b>2.5 Suspension, termination and reinstatement of a FF-PFA</b>					
<i>2.5.1 Suspension and termination</i>	USA	Technical	1 <sup>st</sup> sentence	Add at the end, "or a non-compliance with the operational procedures."	
<i>2.5.2 Reinstatement</i>	USA	Technical	First dash point	Add, "Note that the three life cycle criteria should only apply to those species that do not have a diapause requirement to complete their life cycles. If they have a diapause requirement then freedom for these pests should be based on detection surveys after the next seasons emergence time."	Needed for added clarification to cover all situations.
<b>Annex 1 Guidelines on trapping procedures</b> [title]					
<b>Annex 1.</b> 1. Trapping survey objectives and applications					
<b>Annex 1.</b> 2. Traps and attractants used for fruit flies					
<b>Annex 1.</b> 2.1 Trap descriptions					

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<b>Annex 1.</b> 2.1.1 Jackson trap (JT)					
<b>Annex 1.</b> 2.1.2 McPhail trap (McP)					
<b>Annex 1.</b> 2.1.3 Plastic two-piece McPhail trap					
<b>Annex 1.</b> 2.1.4 Steiner trap					
<b>Annex 1.</b> 2.1.5 Tephri trap					
<b>Annex 1.</b> 2.1.6 Open bottom dry trap (OBDT)					
<b>Annex 1.</b> 2.1.7 yellow trap					
<b>Annex 1.</b> Table 1. List of lures and attractants used in fruit fly traps					
<b>Annex 1.</b> 3. Trap density for establishment and for maintenance	USA	Technical	1 <sup>st</sup> para	Add, "Trap densities should be based on generally recognized standards like the IAA Area Wide trapping guide."	This is essential to standardized this factor.
<b>Annex 1.</b> Figure 1. Diagram to illustrate trap density according to pest free area or area of low pest prevalence					
<b>Annex 1.</b> 3.1 Trapping densities according to the type of target areas	USA	Technical	2 <sup>nd</sup> para	Delete this para	We can not agree to the lowering trap densities if sampling is being used. Densities should be based on standards such as those of IAEA.
<b>Annex 1.</b> 4. Layout of trapping network					
<b>Annex 1.</b> 5. Trap placement	USA	Technical	2 <sup>nd</sup> para	Change 4- 6 to 8-12.	4-6 feet is way too low and not acceptable.
<b>Annex 1.</b> 6. Trap mapping	USA	Technical			We can not agree with this section as written. Trap maps should be made at the time of placement and all data recorded at that time. You should not wait until all traps have been placed as stated. Also, maps should always be drawn of each site and written records maintained unless you are using PDAs. This is to allow QC personnel or trading partners to go and find traps for quality control inspections or when a trapper is sick. Also, a GIS database must allow for relocation and

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					changing trap locations since relocating traps is mandatory in order to cover an entire area effectively.
<b>Annex 1.</b> 7. Trap service intervals	USA	Technical			Traps should be checked at intervals to ensure trapped flies do not decompose before proper identification is possible.
<b>Annex 1.</b> 8. Trap record keeping	USA	Technical	2 <sup>nd</sup> dash point		This is unclear whether the 24 months is before, during or after the establishment of the FF PFA.
<b>Annex 1.</b> 9. Quality control for trapping procedures					
<b>Annex 1.</b> 10. Flies per trap per day (FTD)	USA	Technical	Whole section	Delete	We are not really sure what value this section adds to the standard as it of little practical value except for maybe in establishing a ALPP. This is really a meaningless measurement. For example, in a large area the FTD would be the same with a large infestation in one portion of the total area or a more generalized infestation over the entire area. It may be easy to calculate but it tells you little about the distribution or intensity of an infestation.  Recommend this section be deleted.
		Technical	New section	Trap Relocation	There needs to be a section on trap relocation. Traps must be relocated based on available hosts and the availability of ripe fruit. Relocation should be done at least every three to four months based on the hosts in the area. Traps can not stay in the same tree or property for the entire year. The traps in use are not that effective so relocation is mandatory in order to effectively ascertain if target pests are in the area or not.
<b>Annex 1.</b> reference document					
<b>Annex 2. Guidelines for fruit sampling</b> [title]	USA	Technical	Whole Annex		It should be stated up front in this section that sampling is mostly used after adults are detected and that trapping is the primary tool for detecting fruit flies. It is not a primary

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					tool to maintain an area for sure.
<b>Annex 2.</b> 1. Background					
<b>Annex 2.</b> 2. Scope					
<b>Annex 2.</b> 3. Fruit Sampling Objectives	USA	Technical			The issue of non-hosts is not addressed here. Certain fruits may be non-hosts for fruit flies, but under specific conditions (fruit damage, maturity, etc.) may serve as hosts for a particular species of fruit fly. This should be mentioned here.
<b>Annex 2.</b> Table 1. Fruit sampling applications related to the programme objective and operational phase					
<b>Annex 2.</b> 4. Fruit Sampling Methods and Procedures					
<b>Annex 2.</b> 4.1 General sampling					
<b>Annex 2.</b> Tables 2. Fruit sampling frequencies					
<b>Annex 2.</b> Tables 3. Fruit sampling levels per km <sup>2</sup>	USA	Technical			It is difficult to provide general numbers for sampling of fruit due to variability between fruit fly species and the types of fruit that may be attacked. For example, if there is a requirement to sample 2 kg of fruit, this may be equal to only 4 mangos but may consist of 100's or 1000's of small fruits (e.g. berries). It may be useful to include more explanatory text for the table, or delete the table altogether since it could be misleading depending on the particular fruit fly / host situation.
<b>Annex 2.</b> 4.2 Systematic sampling					
<b>Annex 2.</b> 4.3 Selective sampling					
<b>Annex 2.</b> 5 Fruit Sampling Procedures					
<b>Annex 2.</b> 5.1 Division of sampling area and location of sampling sites					

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<b>Annex 2.</b> 5.2 Organization					
<b>Annex 2.</b> Figure 1. Organizational structure of the fruit sampling section					
<b>Annex 2.</b> 5.3 Fruit collection procedures					
<b>Annex 2.</b> 6. Fruit processing					
<b>Annex 2</b> 6.1 Fruit cutting					
<b>Annex 2.</b> 6.2 Fruit holding and maturing					
<b>Annex 2.</b> Table 4. Major fruit flies and their hosts	USA	Technical			Suggest to delete the entire table; there are inaccuracies and incorrect information in the table. For instance, the host list for C. capitata and B. dorsalis are both missing any citrus hosts, a major host. This table seems to be lacking a lot of host information.
<b>Annex 2.</b> 7. Record Keeping					
<b>Annex 2.</b> 8. References					
<b>Annex 2.</b> Table 5. Example of fruit collection records in year 2003					
<b>Annex 3. Guidelines on corrective action plans</b>					
<b>Annex 3.</b> 1. Determination of the phytosanitary status of the detection (actionable or non actionable)					
<b>Annex 3.</b> 2. Suspension of FF-PFA status					
<b>Annex 3</b> 3. Implementation of control measures in the affected area					
<b>Annex 3.</b> 4. Criteria for reinstatement of a FF-PFA after an outbreak and actions to be taken					
<b>Annex 3.</b> 5. Notification of					

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relevant agencies					
<b>Appendix 1. Most important fruit fly pests</b>					
<b>Appendix 1. Bibliography</b>					

## 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	<del>Requirements for imported consignments</del>	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

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