

Template for comments - Draft ISPMs for country consultation, 2006

DRAFT ISPM: ESTABLISHMENT OF AREAS OF LOW PEST PREVALENCE FOR FRUIT FLIES (TEPHRITIDAE)

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

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

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					
REFERENCES					
DEFINITIONS	USA	technical	Target fruit fly species	Delete term / definition	Not necessary
ABBREVIATIONS USED IN THIS STANDARD					
OUTLINE OF REQUIREMENTS					
BACKGROUND					
REQUIREMENTS					
1. General Requirements					
1.1 Determination of an FF-ALPP					
1.1.1 Target fruit fly species	USA	technical	section	Delete section	Not very useful
1.1.2 Delimitation of the area	USA	technical	First paragraph	Add a second paragraph: "At a minimum, an artificially created buffer area around the perimeter of the FF-ALPP would be required and the width should be based on the biology of the pest, in particular its known flight range. The buffer could be maintained in one of two ways – continuous application of bait sprays or removal of all host plants."	Otherwise, fruit from within the FF-ALPP could be infested by pre-mated females from outside the area.

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	USA	technical	End of section	Add a paragraph: "ALPPs for fruit flies may also include temporal/seasonal periods of low pest prevalence. In addition, ALPPs for fruit flies may result from ecological extremes/limits, or in case where only resistant hosts are present."	
1.2 Procedures to establish an FF-ALPP					
1.2.1 Establishment of the parameter used to estimate the level of fruit fly prevalence	USA	technical technical	Last sentence of section Add a last paragraph	Reword to read "Thus FTD can be obtained from FTW by dividing by 7." "The presence of any flies should trigger some regulatory action."	The spatial distribution of the wild population is indeterminate at a trap density as low as 5/mi ² .
1.2.2 Determining the specified level of low prevalence	USA	technical	Second paragraph	Add a last sentence: "If there is a little risk of infestation in the area of import, then the level of risk as indicated by FTD could be higher."	Information on the biology of target fruit flies is non-existent for many species of economic importance and highly variable depending on the source for all others. Equally important is the host situation that exists in the importing country.
1.2.3 Efficiency of trapping devices for surveillance	USA	technical	Last sentence	Add "The detection of any flies should be a trigger for some regulatory and/or control action."	If you are to factor all the variables, you negate the idea of fixed FTD values for individual species and hosts.
1.2.4 Surveillance system					
1.2.5 Control measures	USA	technical	Dash points	Add new dash point "use of resistant varieties or non-hosts"	
1.3 Verification and declaration of low pest prevalence					
1.4 Maintenance of the FF-ALPP					
1.4.1 Surveillance					
1.4.2 Control measures	USA	technical	Last sentence	Add: "A single fly could trigger control measures at a minimum and ideally some regulation of fruit movement."	If FTD is the trigger, infested fruit will have already been exported by the time flies are detected.
1.4.3 Corrective action plans					
1.5 Suspension, loss and					

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
reinstatement of FF-ALPP status					
1.5.1 Suspension of FF-ALPP status					
1.5.2 Loss of status					
1.5.3 Reinstatement	USA	technical	First dash point	Modify to read "...only after the conditions for establishment and maintenance of the FF-ALPP have again been achieved"	clarity
1.6 Documentation and review					
1.6.1 Documentation					
1.6.2 Record keeping					
1.7 Quality control					
2. Specific Requirements					
2.1 An FF-ALPP as a buffer zone for an FF-PFA, FFF-POP or FFF-PS					
2.1.1 Determination of an FF-ALPP as a buffer zone	USA	technical	Third sentence	Modify to read "It is also relevant to include data related to natural biogeographical features such as prevalence of alternate hosts, climate, location of valleys, plains, rivers, lakes and seas, and those areas that function as natural barriers."	Presence of alternate hosts is also important.
2.1.2 Establishment of an FF-ALPP as a buffer zone					
2.1.2.1 Regulatory controls	USA	editorial	First sentence	Delete "In some cases"	
2.1.3 Maintenance of an FF-ALPP as a buffer zone					
2.2 FF-ALPPs for export purposes	USA	technical	As first paragraph	Insert "Exporting and importing countries should develop mutually agreed upon technical work plans that further define in detail what the specific requirements are for a given situation."	There should always be technical work plans signed by the partners that work this agreement out.
2.2.1 Determination of an FF-ALPP for export purposes					

1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
2.2.1.1 List of products (hosts) of interest					
2.2.1.2 Additional information					
2.2.2 Maintenance of an FF-ALPP for export purposes					
Annex 1 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	technical	Section 3, second sentence	Change “shall” to “should”	
Appendix 1 Examples of FTD values used as low pest prevalence for fruit flies	USA	technical	The whole table	Delete	Suggest deleting this table; these values will need to be agreed bilaterally.

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.**
- **The country name should be that of the country submitting the comments**

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	Requirements for imported consignments	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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