

Template for comments - Draft ISPMs for country consultation, 2006

**DRAFT ISPM - REVISION OF ISPM NO. 2: PEST RISK ANALYSIS**

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 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>					
<b>TITLE OF THE DRAFT</b>					
<b>INTRODUCTION</b>					
SCOPE					
REFERENCES					
DEFINITIONS					
OUTLINE OF REQUIREMENTS					
<b>BACKGROUND</b>	USA	technical	Last paragraph	Add second sentence: "The PRA is not a linear process, but in conducting the whole analysis, it may be necessary to go back and forth between various stages. "	Many people assume that PRA is linear process, i.e. complete steps 1, 2 and 3 without re-visiting previous information or steps. It frequently necessary to go back to earlier stages of a PRA as new information become available.
<b>REQUIREMENTS</b>					
<b>1. PRA Stage 1: Initiation</b>	USA	editorial	Last sentence	Move last sentence of 1. "For pathways, information about the commodity...." To beginning of 1.1.1	More logical location
1.1 Initiation points					
1.1.1 Identification of a pathway	USA	editorial	First sentence after dash points	Rewrite to read "These are situations where the commodity itself is not a pest; rather it serves as a pathway for pests."	
1.1.2 Identification of a pest	USA	editorial	Re-arrange	Suggest to move section 1.1.3 up to	Easier arrangement as it would then go from

			sections 1.1.2, 1.1.3	become new 1.1.2 Review of phytosanitary policies, move 1.1.2 to become new section 1.1.3 Identification of a pest	policy, to pest, to organism
1.1.3 Review of phytosanitary policies					
1.1.4 Identification of an organism	USA	technical	title	Reword to read "Identification of an organism as a potential pest"	clarity
1.2 Determination of an organism as a pest	USA	technical	Second paragraph, last sentence	Suggest rewording "If the organism has not yet been named or fully described, then, to be determined as a pest, it should at least be identifiable and have been shown to produce consistent symptoms and to be transmissible."	The organisms should also be consistently identifiable.
		technical	Dash points	Change word "properties" to "characteristics"	Better wording
		technical	Last sentence of section	Suggest rewording "Particular cases for analysis may include exotic plant species, beneficial organisms...."	
		technical	End of section	Add the following sentence: "The pest potential of plants or other organisms that are modified using genetic engineering (LMOs) should be determined as in Section 1.2.5, with a focus on whether the new or altered trait increases the potential for that organism to be a pest, as compared to the non-modified organism."	This section provide guidance on determinin if an organism identified in Section 1.1.4 as possible candidate for PRA is a pest. There are separate sections on Plants as Pests (1.2. and on Living Modified Organisms (1.2.5). We note that currently most of the LMOs in commerce are plants and a reader could be confused as to whether an LMO plant produ should be considered under the guidance in 1.2.1 or 1.2.5.
1.2.1 Plants as pests	USA	technical	First paragraph after dash points	Delete this paragraph.	It does not provide information and could be very confusing.
		technical	Last sentence	Delete this sentence.	It implies that there necessarily <b>is</b> a decision when in fact many countries allow the impor of plants for planting unless the plants are or a prohibited list. No PRA may be conductec because none is required. The sentence is unclear as to whether the decision is about enterability or whether or not to conduct a PRA in the first place. In either case the

					sentence is unnecessary and confusing.
1.2.2 Beneficial organisms					
1.2.3 Organisms new to science or for which only minimal information is available					
1.2.4 Intentional import of organisms of possible phytosanitary concern					
1.2.5 Living modified organisms	USA	technical	Last paragraph, last sentence	Suggest rewording “If no pest risk assessment is conducted because it is deemed to be unnecessary, the basis of the decision should be recorded.”	
1.3 Identification of the PRA area					
1.4 Previous pest risk analyses					
1.5 Conclusion of initiation	USA	editorial  editorial  editorial	Second paragraph, last sentence  Fourth paragraph, last sentence before dash points  Fifth paragraph, last sentence before dash points	Reword to read “The basis of the decision should be recorded.”  Delete “appear to”, instead say “That ISPM is relevant for organisms that meet the following criteria:”  Delete “appear to”, instead say “That ISPM is relevant for organisms that meet the following criteria:”	This sentence is unclear (communicated to whom?); and is addressed under communication.
<b>2. Summary of PRA Stages 2 and 3</b>					
2.1 Linked standards	USA	technical  technical	Whole section  End of table	Move the whole section and place it after Background  Add ISPM 14 “The use of Integrated Measures in a Systems Approach for Pest Risk Management.”	It seems like Table 1 in particular might be more useful if this information was placed earlier in the standard to make clear the relationship of this standard to other PRA standards.  It would be useful to include reference to ISPM 14 here.

2.2 Summary of PRA Stage 2 Pest risk assessment	USA	technical	Second dash point	Delete "entry, establishment" and say instead "introduction and spread"	Better wording
2.3 Summary of PRA Stage 3 Pest risk management					
<b>3. Aspects Common to All PRA Stages</b>					
3.1 Uncertainty	USA	technical  technical technical  technical	First paragraph, last sentence  First paragraph	Suggest the term "asymptomatic" instead of symptomless  Delete "natural variability in data"  Need to indicate in this section that uncertainty in the PRA should be clearly communicated and documented.  Also would be useful to add that additional data or research may reduce uncertainty, but not variability.	Natural variability is different than uncertainty. Uncertainty can be reduced if provided with additional information; variability may not be reduced.
3.2 Information gathering					
3.3 Documentation					
3.4 Risk communication	USA	technical	Last sentence	Reword to state "At the end of the PRA, evidence supporting the risk analysis, the proposed mitigations and uncertainties may be communicated to interested parties, including other contracting parties, as appropriate."	More specific guidance.
3.5 Consistency in PRA					
<b>APPENDIX 1</b> Pest risk analysis flow chart	USA	technical	Whole section	Suggest it be redone after the standard is modified by SC.	This diagram is not very useful

## **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:

<b>Comment regarding</b>	<b>Wording to be used</b>	<b>Further specification of location</b>
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**

<b>1-Title</b>	<b>2-country</b>	<b>3- Type of comment</b>	<b>4. Location</b>	<b>5. Proposed rewording</b>	<b>6. Explanation</b>
<b>General comments</b>	Name	-	-	The use of NPPO and contracting parties need to be considered throughout the document and made consistent with the IPPC.	
<b>4.1.2 Measures for imported consignments</b>	Name	editorial	Title	<del>Requirements for imported consignments</del>	Aligns with section 4, 4 <sup>th</sup> bullet

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<b>4.1.2 Measures for imported consignments</b>	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
<b>4.1.2 Measures for imported consignments</b>	Name	editorial	Para 3, indent 1	documentary checks	clarification
<b>4.1.2 Measures for imported consignments</b>	Name	technical	Para 3, last indent	Add: phytosanitary inspection.	another appropriate option

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