






2025 First consultation: 01 – 30 September 2025





Compiled comments for - Draft annex International movement of fresh Musa spp. fruit to ISPM 46 (2023-028)

T (Type) - B = Bullet, C = Comment, P = Proposed Change, R = Rating

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	<p>Costa Rica</p> <p>It is considered that the document should be thoroughly reviewed and restructured to ensure it includes only those pests that are clearly associated with the pathway and the intended use of the product (consumption or processing), and that represent a real risk of introduction and establishment. Consequently, it is recommended to exclude from Table 1 all pests not related to the pathway, as well as contaminant pests that fall outside the scope of ISPM 46.</p> <p>Although the pests included are regulated by at least one Contracting Party—as has been accepted in other annexes of this ISPM—it is deemed essential to first verify their technical justification, the reliability of the sources used, and the availability of more updated evidence regarding the fruit's role as a pathway. While it is acknowledged that the document serves as guidance for NPPOs and does not limit the conduct of a Pest Risk Analysis (PRA), its content could become controversial if not properly substantiated.</p> <p>Furthermore, it is recommended to review and adjust Tables 2 and 3 so they include only measures targeting pests directly associated with the pathway and the intended use of the product, supported by scientific evidence, and without compromising the quality of fresh taro corms.</p> <p>Finally, it is suggested to review the mandate of the Technical Panel (TPNP) to better align its tasks with the principles and foundations established in ISPMs 1, 2, and 11, and to ensure that technical information on the pathway, associated pests, and phytosanitary measures is properly assessed for inclusion in draft Annexes.</p> <p><i>Category : SUBSTANTIVE</i></p>
2	G	(General Comment)	C	<p>Argentina</p> <p>Argentina endorses the COSAVE comments to this draft</p> <p><i>Category : SUBSTANTIVE</i></p>
3	G	(General Comment)	C	<p>Antigua and Barbuda</p> <p>Antigua and Barbuda endorses the comments submitted by its RPPO (CAHFSA).</p> <p><i>Category : SUBSTANTIVE</i></p>

4	G	(General Comment)	C	Barbados Barbados supports the development of the proposed standard and endorses the comments as submitted by CAHFSA. <i>Category : SUBSTANTIVE</i>
5	G	(General Comment)	C	Guyana Guyana supports the development of this draft and endorses CAHFSA's comments to this draft. <i>Category : SUBSTANTIVE</i>
6	G	(General Comment)	C	Peru Peru endorses the COSAVE comments to this draft <i>Category : SUBSTANTIVE</i>
7	G	(General Comment)	C	China The principles for collecting regulated pests and the corresponding rules for handling them after collection should be publicly disclosed to all the Contracting Parties. The regulated pests collected through the solicitation process require technical review to eliminate those unlikely to spread. Mechanisms such as establishing technical panels may be employed. However, the current approach only gathers limited data from a few countries, posing significant limitations and making it unsuitable for adoption as an International Phytosanitary Measure Standard. Pests need to be screened to retain pests for which bananas are hosts and pests that can be spread with commercial bananas. Brazil Agreed. However, there is a call for information material, and unfortunately, a few countries contributed to this call. As a result, it may reflect only a snapshot of what was submitted and not the full reality of what is actually regulated in trade. Please note that, according to ISPM 46, the pests listed in this draft should be limited to those regulated by at least one contracting party in international fruit trade. Even so, I agree that some of them need a revision. <i>Category : SUBSTANTIVE</i>
8	G	(General Comment)	C	United States of America Table 1 lists the 'Pests considered to be associated with fresh Musa spp. Fruit' but it is missing several pests and diseases associated with banana. Some of the notable gaps are the omission of nematodes and viral pests. The list of bacterial pathogens listed on the table is incomplete and is missing several important pathogens. Please refer to the following documents on viral and bacterial pests of banana. Blomme et al. Bacterial Diseases of bananas and Enset: Current state of knowledge and integrated approaches towards sustainable

				<p>management. 2017. Frontiers in Plant Science. doi: 10.3389/fpls.2017.01290</p> <p>Kumar et al. Chapter Seven – Biology, etiology, and control of viral diseases of banana and plantain. https://doi.org/10.1016/bs.aivir.2014.10.006</p> <p>https://area.ifas.ufl.edu/media/areaifasufledu/docs/fact-sheet-1-en.pdf</p> <p>The corresponding Phytosanitary measures for nematodes and viruses will be different from other pests. For examples, for nematodes the Phytosanitary measures can be establishment of pest free areas, development of pest specific diagnostic measures, and testing for the specific pathogens. For viruses, the Phytosanitary measures can be development of pest specific diagnostic measures, pre-harvest sampling for laboratory testing.</p> <p>Brazil Please note that, according to ISPM 46, the pests listed in this draft should be limited to those regulated by at least one contracting party in international fruit trade (see Scope section). The list of measures should reflect those applied in international trade by at least one contracting party. This is not intended to be a pest list for Musa spp.</p> <p><i>Category : SUBSTANTIVE</i></p>
9	G	(General Comment)	C	<p> Brazil Italy Italy endorses the EPPO comments to this draft <i>Category : SUBSTANTIVE</i></p>
10	G	(General Comment)	C	<p> Brazil Paraguay We support the comments from COSAVE. <i>Category : SUBSTANTIVE</i></p>
11	G	(General Comment)	C	<p> Brazil Belarus Belarus has no comments to these specifications and supports the review of the standard. <i>Category : TECHNICAL</i></p>
12	G	(General Comment)	C	<p> Brazil United Kingdom The United Kingdom endorses the EPPO comments to this draft <i>Category : SUBSTANTIVE</i></p>
13	G	(General Comment)	C	<p> Brazil Caribbean Agricultural Health and Food Safety Agency The Standard includes pests that do not follow the pathway. While ISPM 46 stipulates that the inclusion is based on at least one</p>

				country regulating the pest, the panel does not know with what level of rigor was the assessment conducted to regulate the pest. Also, noting that the commodity is intended for consumption and processing, certain pests are not likely to follow the pathway. It is recommended that the panel reviews the procedures on how to determine inclusion of a pest and consider conducting a more thorough assessment of the pests to include. <i>Category : SUBSTANTIVE</i>
14	G	(General Comment)	C	 Brazil Caribbean Agricultural Health and Food Safety Agency Jamaica supports the development of this important commodity standard. <i>Category : SUBSTANTIVE</i>
15	G	(General Comment)	C	 Brazil; Guyana Caribbean Agricultural Health and Food Safety Agency Antigua and Barbuda supports the adoption of this commodity standard. The draft document is comprehensive and covers the majority of the pests of concern to the Caribbean region. <i>Category : SUBSTANTIVE</i>
16	G	(General Comment)	C	 Brazil Korea, Republic of Korea supports the region comments submitted by APPPC. <i>Category : SUBSTANTIVE</i>
17	G	(General Comment)	C	 Brazil Japan The snail species <i>Lissachatina fulica</i> [228] and <i>Succinea</i> spp. [231], and the fungal species <i>Mycosphaerella musicola</i> [243] and <i>Fusarium oxysporum</i> f. sp. <i>cubense</i> Tropical Race 4 [249], listed in Tables 1 and 3, are significant pests in banana orchards. However, they are considered contaminating pests if they are associated with the international movement of fresh banana fruits for consumption. Therefore, these pests should be removed from the list of targeted pests in this annex, as they do not meet the requirements of ISPM 46. <i>Category : SUBSTANTIVE</i>
18	G	(General Comment)	C	Japan Even if pests are contaminating pests, countries can regulate them as quarantine pests based on technical justification because this is their sovereign authority. However, the ISPM 46 states that the scope of this standard and its annexes does not include contamination or diversion from intended use of commodities. Therefore, contaminating pests are not targeted pests in annexes of ISPM 46. Due to ambiguities in the requirements for pests to be included in


			<p>the pest list under ISPM 46, a contaminating pest could be also included as the targeted pest in the annexes to ISPM 46. Even if a pest is only targeted when it is diverted from the intended use of a commodity (e.g. from consumption to planting), it could still be included as a targeted pest in the annexes to ISPM 46.</p> <p>Guidance should be developed separately to clarify under what cases "contaminating pests" or "diversion from intended use of the commodity" correspond, and examples should be provided. <i>Category : SUBSTANTIVE</i></p>
19	G	(General Comment)	<p>C Colombia</p> <p>The Colombian Agricultural Institute (ICA) as the National Plant Protection Organization (NPPO) of Colombia has analyzed in detail the draft annex entitled "International movement of fresh fruit of Musa spp. (2023-028)", of the International Standard for Phytosanitary Measures (ISPM) No. 46 "Standards for product-specific phytosanitary measures", finding the preparation and publication of this annex unnecessary, for the following reasons:</p> <ul style="list-style-type: none"> - Currently, the regulatory framework of the International Plant Protection Convention (IPPC) includes ISPM No. 2 "Framework for Pest Risk Analysis", ISPM No. 11 "Pest Risk Analysis for Quarantine Pests" and ISPM No. 21 "Pest Risk Analysis for Regulated Non-Quarantine Pests", which indicate sufficiently clear guidelines for the implementation of the three stages of the pest risk analysis. Pest Assessment (ARP) (initiation, pest risk assessment and pest risk management), both for quarantine pests and for regulated non-quarantine pests. Similarly, this regulation documents generic aspects related to information collection, documentation, risk communication, uncertainty, and coherence, which are considered to be sufficient to carry out an ARP in a reliable, transparent, technical, and scientific manner. - In numeral 3 "Pests associated with the fresh fruit of Musa spp.", it is indicated that "The pests listed in Table 1 are considered associated with the fresh fruit of Musa spp. and are regulated in international trade by at least one of the contracting parties", for which it is important to indicate that, to include pests in a regulation of international magnitude and impact, On the basis that these are part of phytosanitary requirements, it is not a technically justified criterion, because in operational reality many of these requirements are based on old requirements, supported by outdated sources that do not meet adequate scientific or reliability standards to require phytosanitary measures. <p>According to Zlotina (2015) in his article entitled "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" the way in which information is handled (cited, analyzed, discussed) can have serious and long-</p>






			<p>lasting consequences for NPPOs. Information about pests, including their condition in an area or in a host, can be cited in one source, and then this source is cited again in others without having been validated or verified. This results in "circular references" in which the original source of information may be lost, but the record is perpetuated in secondary sources, which often cite themselves. "Circular" information regarding historical records of the presence or absence of pests, or the status of plants as pest hosts, may not be accurate from the outset or outdated. When these records are repeatedly cited in the scientific literature, they become part of the scientific literature and are extremely difficult to correct.</p> <p>The context presented by Zlotina (2015) is the same as that generated when pests are included and phytosanitary measures are required for international trade only because another NPPO requests them without knowing the background of how these phytosanitary requirements were established, and without carrying out a systematic process of feedback from the primary sources of the requirements. Therefore, it is essential to use the ARP as an operational principle, which is the current tool that allows NPPOs to technically and scientifically analyze the information that exists on the condition of a pest in an area, the pest-host relationship, the criteria on the route of entry of the pest, the categorization of the pest and the need and objectivity of mitigation measures. thus enabling transparent, fair and science-based trade.</p> <p>Validating pests without due consideration of the quality and technical reliability of the information goes against the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) of the World Trade Organization (WTO), the basic principle of technical justification and the operational principle of risk analysis established in ISPM No. 1, "Phytosanitary Principles for the Protection of Plants and the Application of Phytosanitary Measures in International Trade" and ISPMs Nos. 2 and 11.</p> <p>- The section "Pests associated with fresh fruit of Musa spp." states that "The inclusion of a pest in Table 1 does not constitute any technical justification for its regulation by importing countries using this standard. In determining whether to regulate any of the pests listed in this standard for products, the NPPO of the importing country should base its decision on a technical justification, using a pest risk analysis or, where appropriate, another type of comparable review and evaluation of the available scientific information." This strongly confirms that the draft annex is not providing a benefit to NPPOs, to the implementation of the SPS Agreement, or to the facilitation of international trade in</p>
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			<p>agricultural products; on the contrary, it leads importing countries to consider the list of pests and mitigation measures as a reliable source. upon ratification and issuance by the IPPC, and establish phytosanitary measures based on the annex. This would force exporting countries to allocate human, financial and logistical resources to implement mitigation measures that are not necessary, thus ignoring that the PRA is a principle and a non-negotiable tool, which guarantees transparency in the international trade of agricultural products.</p> <p>- Table 1 "Pests considered to be associated with the fresh fruit of Musa spp." is imprecise and unreliable, because it does not present the scientific evidence that supports their pest status in the fresh fruit of Musa. In addition, this table includes pests that are specific to foliage and lists others whose scientific evidence indicates that they do not affect Musa spp. which leads to the international dissemination of arbitrary and unjustified measures on the basis that they are included in an ISPM.</p> <p>- Additionally, ISPM No. 2 states that "The taxonomic level for organisms considered in the PRA is generally the species. The use of a higher or lower taxonomic level should be justified with solid scientific arguments" therefore, it is also unfeasible to include organisms at the genus level without defining the species.</p> <p>- Regarding the inclusion of <i>Fusarium oxysporum</i> f.sp. Tropical Race 4 (Foc TR4), in Table 1 and the mention that the appropriate mitigation measures for this pathogen are free areas or free production sites (Table 3), respectfully expresses concern about the erroneous message that is being spread. The above, taking into account that research carried out by the Plant Biosecurity Laboratory of the Australian Department of Agriculture, Fisheries and Forestry (DAFF), in which 451 tissue samples of Cavendish banana fruit from plants infected with Foc TR4 were analyzed, it was concluded that this pathogen does not infect the fruit (DAFF, 2018). Additional studies confirm that even in advanced stages of the disease, the fruit remains free of Foc TR4 infection (Daly & Walduck, 2006; Dita et al., 2010).</p> <p>The incorporation of this pest as associated with fresh fruit of Musa spp. for human consumption constitutes an unjustified measure that imposes disproportionate restrictions on international trade, with significant social and economic impacts for producing countries. This measure compromises the competitiveness of the sector, generates uncertainty in the markets and puts at risk thousands of direct and indirect jobs linked to this production chain.</p> <p>The report of the Standards Committee held from 12 to 16 May</p>
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			<p>2025, in Rome, Italy, states that "Some SC members expressed doubt about whether Musa fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of Musa to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending consultation comments". However, it is considered that disseminating this information worldwide without prior validation is an unwise practice, which generates confusion and misinformation, thus promoting unjustified measures by importing countries and the use of scarce resources to implement actions that are not required or, failing that, making exports unviable. While recognizing the sovereign right of countries to establish phytosanitary measures to protect plant health, this right should be exercised on the basis of scientific criteria and without creating unnecessary obstacles to international trade.</p> <p>Therefore, and in accordance with the principles established in ISPM No. 1, it is categorically requested not to disseminate information contrary to the existing scientific evidence, which demonstrates that Foc TR4 does not affect the fresh fruit of Musa spp., and requiring this type of phytosanitary measures for this pest constitutes a barrier to trade, lacking scientific justification and contrary to the principles of the IPPC.</p> <p>- On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one</p>
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			<p>are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>- Regarding mitigation measures, it is clarified that these should not be promoted in a generalized way or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary.</p> <p>- Similarly, the annex proposal indicates the possibility of implementing irradiation treatments, which is not feasible due to the absence of scientific support on its impact on the organoleptic and physiological characteristics of the product; This brings with it inaccuracies in the request for technically unjustified mitigation measures and economic repercussions on exporting countries.</p> <p>- Persisting in the idea of developing standards by species leads to downplaying the importance of approved standards such as ISPMs No. 2 and No. 11, moving away from the foundations and principles of the SPS Agreement.</p> <p>The historical trade in fresh banana fruit shows that this standard is unnecessary, as countries have now been applying the standards of the standards published by the IPPC related to this type of trade (ISPM No. 2, 11, 14, 21). Colombia has a significant historical trade in fresh banana fruit on different continents. By 2024, the country registered exports to 55 countries for more than 1.1 million tons, and in the period from January to July 2025, nearly one million tons have been exported. The issuance of this document puts at risk the sustainability of more than 80,000 hectares registered for export, which currently generates about 63,500 direct jobs and 195,000 indirect jobs in the country and</p>
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			<p>the investment in social programs in housing, education, health and recreation that benefits more than 200,000 families, as a result of the exports of fresh fruit from Musa spp. of Colombian origin.</p> <p>Taking into account the above arguments, Colombia expresses its total disagreement with the document entitled "International Movement of the Fresh Fruit of Musa spp. (2023-028)" and places on record the request not to issue regulations with these characteristics.</p> <p>In addition to the above considerations, it is respectfully stated that the image published on the IPPC website to accompany the public consultation of the draft annex on the international movement of fresh fruit of Musa spp. does not represent international trade in this product. The photograph in question generates a wrong perception, since it does not reflect the technical standards that govern this trade, which include good agricultural practices, strict phytosanitary measures, physiological ripening requirements, as well as other international criteria that guarantee the quality and safety of the exported bananas. Finally, we reiterate that Colombia, through the ICA, expressed its total disagreement with the issuance of ISPM No. 46 "Standards for product-specific phytosanitary measures", which was reported to the IPPC in ICA Letter No. 20182116449 of August 28, 2018, on which Ms. Sandra Goritschnig, of the Standard Setting Associate of the IPPC acknowledged receipt at the time. Likewise, in 2017 the ICA also expressed its disagreement with the ISPM publication project entitled "International Cut Flower Movement (2008-005)", a position that was presented at the IPPC regional workshop for Latin America, held in September 2017, in Cusco, Peru, reported in the IPPC SCL and ratified through ICA Official Letter No. 20172116384 of October 5, 2017, addressed to Mr. Ezequiel Ferro, Secretary of Coordination of the Standards Committee at the time. On that occasion, the aforementioned ISPM project was archived, thus validating the technical arguments presented by Colombia.</p> <p><i>Category : SUBSTANTIVE</i></p>
20	G	(General Comment)	<p>C European Union</p> <p>The EU and its 27 Member States endorse the EPPO comments to this draft</p> <p><i>Category : SUBSTANTIVE</i></p>
21	G	(General Comment)	<p>C  Brazil</p> <p>Malaysia</p> <p>1. Malaysia supports the proposed draft annex to ISPM 46 on banana as a guiding document for NPPOs to conduct PRA based on pests of significance in their areas. The annex should clarify</p>

				that the pest list is illustrative only and not prescriptive, as pest situations vary and to allow scientific information flexibility (For example, geographical area, climate situation, etc.) 2. Malaysia also supports the APPPC regional comments. <i>Category : SUBSTANTIVE</i>
22	G	(General Comment)	C	EPPO It should be ensured all references are accesible and correspond to the referred phytosanitary measure. <i>Category : SUBSTANTIVE</i>
23	G	(General Comment)	C	 Brazil EPPO When relevant, it is important that the TPCS requests clarification on technical justifications submitted by contracting parties to support the listing of pests in the commodity standard, to avoid listing of pests that are not relevant to the commodity <i>Category : SUBSTANTIVE</i>
24	G	(General Comment)	C	 Brazil India India supports the proposed draft annex with the comments attached. <i>Category : SUBSTANTIVE</i>
25	G	(General Comment)	C	 Brazil Paraguay Paraguay supports COSAVE comments. <i>Category : SUBSTANTIVE</i>
26	G	(General Comment)	C	 Brazil Thailand Thailand supports the draft annex and also supports the regional comments submitted by APPPC. <i>Category : SUBSTANTIVE</i>
27	G	(General Comment)	C	Singapore 1. Singapore supports the proposed draft annex to ISPM 46 on banana as a guiding document for respective NPPO to conduct your own respective PRA based on the identified pests of significance of your PRA area. The annex should be made clearer that the pest list is only an illustrative example by a contracting party (CP) which regulates the commodity as per the drafting guide and not to be taken as the only pest list for this commodity as the pest situation varies in different PRA area. 2. Singapore supports the regional comments from the APPPC on this draft annex. <i>Category : SUBSTANTIVE</i>
28	G	(General Comment)	C	 Brazil Uruguay Uruguay supports COSAVE comments

				<i>Category : SUBSTANTIVE</i>
29	G	(General Comment)	C	 Brazil; Thailand APPPC The APPPC notes several key points regarding commodity standards that warrants further consideration and clarification with the SC as follows: 1. Clarity on inclusion/exclusion of pests in commodity standards i.e. pests associated with plant parts intended for trade, not intended for trade or with incidental contamination (eg leaves, soil, debris) or , are contaminating pests infesting the commodity, are regulated by some NPPOs, those linked to waste generated during processing or consumption (eg fruit skins), pose a risk only when the commodity is diverted from its intended use, especially when such diversion is frequent or occurs inadvertently. The APPPC proposes that these categories of pests are a) explicitly excluded from commodity standards or b) supplementary explanatory text is included when pest association with the commodity is unclear or diversion from intended use is common. The issue needs further discussion with the SC as it may have implications for the interpretation and application of ISPM 46. Refer to the detailed paper from the APPPC. 2. Enhancing transparency in pest exclusion: To improve transparency and support NPPOs in submitting relevant information, the APPPC proposes that the TPCS publish a brief explanation on the IPP, outlining the rationale for excluding specific pests submitted by CPs. Also, this would clarify the mandate of the TPCS and their decisions about pest list development to foster greater understanding among CPs. The APPPC proposed that this could form part of the CPM-20 side session on commodity standards. (Refer to the detailed paper from the APPPC to the SC.) <i>Category : SUBSTANTIVE</i>
30	G	(General Comment)	C	 Brazil New Zealand 1. New Zealand thanks the Technical Panel on Commodity Standards (TPCS) for their work and supports the draft annex. 2. New Zealand supports the region comments submitted by APPPC and PPPO. <i>Category : SUBSTANTIVE</i>
31	G	(General Comment)	C	 Brazil South Africa The draft annex to standard is important for harmonization within the Region. <i>Category : SUBSTANTIVE</i>
32	G	(General Comment)	C	 Brazil Thailand Thailand is of the view that the list of pests associated with each commodity in the draft annex should only include those that are

				<p>significant and pose a risk of being carried with the commodity. Although the accepted criteria for pest list gathering may come from one country, it should be considered whether it is recognized or not in order to simplify the pest list and reduce excess information. For example, some pests, such as the giant African snail or <i>Spodoptera frugiperda</i>, should not be included in the list of pests related to banana fruit.</p> <p><i>Category : SUBSTANTIVE</i></p>
33	G	(General Comment)	C	<p>Panamá</p> <p>Panamá considera innecesario el desarrollo de este Anexo de la NIMF 46, tomando en cuenta que los frutos de musa, históricamente se comercializan internacionalmente sin mayores exigencias fitosanitarias y sin que a la fecha se reporten evidencias de su capacidad de constituirse en una vía de dispersión de plagas.</p> <p><i>Category : SUBSTANTIVE</i></p>
34	G	(General Comment)	C	<p>OIRSA</p> <p>Hacer una revisión exhaustiva de la Tabla 1, especialmente moscas de la fruta, hongos, Caracol gigante africano entre otros por no seguir la vía de riesgo.</p> <p><i>Category : SUBSTANTIVE</i></p>
35	G	(General Comment)	C	<p>OIRSA</p> <p>OIRSA considera que este Proyecto de anexo no debe ser considerado, ya que contempla especies en el listado de plagas que no esta acorde al riesgo asociado y es un producto históricamente comercializado mundialmente.</p> <p><i>Category : SUBSTANTIVE</i></p>
36	G	(General Comment)	C	<p> OIRSA</p> <p>IPPC Regional Workshop Latin America</p> <p>Se considera que el documento debe ser revisado y replanteado en su totalidad para asegurar que incluya únicamente aquellas plagas que estén claramente asociadas con la vía y el uso previsto del producto (consumo o procesamiento), y que representen un riesgo real de introducción y establecimiento. En consecuencia, se recomienda excluir de la Tabla 1 todas las plagas que no estén relacionadas con la vía, y plagas contaminantes que están fuera del alcance de la NIMF 46.</p> <p>Si bien las plagas incluidas están reglamentadas por al menos una Parte Contratante —tal como se ha aceptado en otros anexos de esta NIMF—, se considera indispensable verificar previamente su justificación técnica, la confiabilidad de las fuentes utilizadas y la existencia de evidencia más actualizada sobre la condición del fruto como vía. Aunque se reconoce que el documento es una guía para las ONPF y no limita la realización de un Análisis de Riesgo de Plagas (ARP), su contenido podría generar controversia si no está debidamente fundamentado.</p>

			<p>Además, se recomienda revisar y ajustar las Tablas 2 y 3 para incluir únicamente medidas dirigidas a plagas directamente asociadas con la vía y el uso previsto del producto, con respaldo científico, y que no comprometan la calidad del fruto fresco de banano.</p> <p>Finalmente, se sugiere que se revise el mandato del Panel técnico (PTNP) para adecuar las tareas con el fin de mejorar su coherencia con los principios y fundamentos establecidos en las NIMF 1, 2 y 11. y se pueda evaluar la información técnica sobre la vía, las plagas asociadas y las medidas fitosanitarias que debería incluirse en los borradores de Anexos.</p> <p><i>Category : SUBSTANTIVE</i></p>
37	G	(General Comment)	<p>C Colombia</p> <p>El Instituto Colombiano Agropecuario (ICA) como Organización Nacional de Protección Fitosanitaria (ONPF) de Colombia ha analizado detalladamente el proyecto de anexo titulado "Movimiento internacional del fruto fresco de Musa spp. (2023-028)", de la Norma Internacional para Medidas Fitosanitarias (NIMF) No. 46 "Normas para medidas fitosanitarias específicas para productos", encontrando innecesaria la elaboración y publicación de este anexo, por las siguientes razones:</p> <ul style="list-style-type: none"> - En la actualidad el marco normativo de la Convención Internacional de Protección Fitosanitaria (CIPF) contempla la NIMF No. 2 "Marco para el análisis del riesgo de plagas", NIMF No. 11 "Análisis de riesgo de plagas para plagas cuarentenarias" y NIMF No. 21 "Análisis de riesgo de plagas para plagas no cuarentenarias reglamentadas", las cuales señalan directrices suficientemente claras para la implementación de las tres etapas del análisis de riesgo de plagas (ARP) (inicio, evaluación del riesgo de plagas y manejo del riesgo de plagas), tanto para plagas cuarentenarias, como para plagas no cuarentenarias reglamentadas. De igual manera, esta normatividad documenta aspectos genéricos relativos a la recolección de información, la documentación, la comunicación del riesgo, la incertidumbre y la coherencia, los cuales se consideran que son suficientes para llevar a cabo de manera confiable, transparente, técnica y científica un ARP. - En el numeral 3 "Plagas asociadas al fruto fresco de Musa spp." se indica que "Las plagas que figuran en el Cuadro 1 se consideran asociadas al fruto fresco de Musa spp. y están reglamentadas en el comercio internacional por al menos una de las partes contratantes", para lo cual es importante indicar que, incluir plagas en una regulación de magnitud e impacto internacional, teniendo como base que estas hacen parte de requisitos fitosanitarios, no es un criterio técnicamente justificado, debido a que en la realidad operativa muchas de estas exigencias se basan en requisitos antiguos, soportados en fuentes desactualizadas que no cumplen con estándares científicos ni de

			<p>confiabilidad adecuados para requerir medidas fitosanitarias.</p> <p>- En el numeral 3 "Plagas asociadas al fruto fresco de Musa spp." se indica que "Las plagas que figuran en el Cuadro 1 se consideran asociadas al fruto fresco de Musa spp. y están reglamentadas en el comercio internacional por al menos una de las partes contratantes", para lo cual es importante indicar que, incluir plagas en una regulación de magnitud e impacto internacional, teniendo como base que estas hacen parte de requisitos fitosanitarios, no es un criterio técnicamente justificado, debido a que en la realidad operativa muchas de estas exigencias se basan en requisitos antiguos, soportados en fuentes desactualizadas que no cumplen con estándares científicos ni de confiabilidad adecuados para requerir medidas fitosanitarias.</p> <p>De acuerdo con Zlotina (2015) en su artículo titulado "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" la forma en que se maneja la información (citada, analizada, discutida) puede tener consecuencias graves y duraderas para las ONPF. La información sobre plagas, incluyendo su condición en un área o en un hospedante, puede citarse en una fuente, y luego esta fuente se vuelve a citar en otras sin haber sido validada o verificada. Esto da lugar a «referencias circulares» en las que la fuente original de información puede perderse, pero el registro se perpetúa en fuentes secundarias, que a menudo se citan a sí mismas. La información «circular» relativa a los registros históricos de presencia o ausencia de plagas, o a la situación de las plantas como hospedantes de plagas, puede no ser precisa desde el principio o estar desactualizada. Cuando estos registros se citan repetidamente en la literatura científica, pasan a formar parte de la misma y resulta extremadamente difícil corregirlos.</p> <p>El contexto presentado por Zlotina (2015), es el mismo que se genera cuando se incluyen plagas y se exigen medidas fitosanitarias para el comercio internacional solo porque otra ONPF la solicita desconociendo los antecedentes de cómo se establecieron esos requisitos fitosanitarios, y sin llevar a cabo un proceso sistemático de retroalimentación de las fuentes primarias de los requisitos. Por lo tanto, es fundamental emplear como principio operativo el ARP, el cual es la herramienta actual que permite a las ONPF analizar técnica y científicamente la información que existe sobre la condición de una plaga en un área, la relación plaga - hospedante, los criterios sobre la vía de ingreso de la plaga, la categorización de la plaga y la necesidad y objetividad de las medidas de mitigación, permitiendo así un comercio transparente, justo y basado en ciencia.</p> <p>Validar plagas sin considerar debidamente la calidad y fiabilidad técnica de la información, va en contravía del Acuerdo Sobre la</p>
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			<p>Aplicación de Medidas Sanitarias y Fitosanitarias (Acuerdo MSF) de la Organización Mundial del Comercio (OMC), del principio básico de justificación técnica y del principio operativo de análisis de riesgo establecido en las NIMF No. 1, "Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional" y de las NIMF No. 2 y 11.</p> <p>- La sección "Plagas asociadas al fruto fresco de Musa spp." indica que "La inclusión de una plaga en el Cuadro 1 no constituye justificación técnica alguna para su reglamentación por los países importadores que usen esta norma. Al determinar si reglamentar alguna de las plagas enumeradas en la presente norma para productos, la ONPF del país importador debería basar su decisión en una justificación técnica, utilizando un análisis de riesgo de plagas o, cuando proceda, otro tipo de examen y evaluación comparables de la información científica disponible". Lo anterior, ratifica contundentemente que el proyecto de anexo no está aportando un beneficio a las ONPF, a la implementación del Acuerdo MSF, ni a la facilitación del comercio internacional de productos agrícolas; por el contrario, conlleva a que los países importadores consideren la lista de plagas y las medidas de mitigación como una fuente confiable, al ser ratificada y emitida por la CIPF, y establezcan medidas fitosanitarias basadas en el anexo. Esto obligaría a los países exportadores a destinar recursos humanos, financieros y logísticos para implementar medidas de mitigación que no son necesarias, desconociendo así que el ARP es un principio y una herramienta no negociable, la cual garantiza la transparencia en el comercio internacional de productos agrícolas.</p> <p>- El cuadro 1 "Plagas que se consideran asociadas al fruto fresco de Musa spp." es impreciso y no confiable, debido a que no presenta las evidencias científicas que soportan su condición de plagas en la fruta fresca de Musa. Adicional, este cuadro incluye plagas que son específicas de follaje y lista otras cuya evidencia científica señala que no afectan Musa spp. lo cual deriva nuevamente a difundir internacionalmente medidas arbitrarias e injustificadas basándose en que están incluidas en una NIMF.</p> <p>- Adicional la NIMF No. 2 indica que "El nivel taxonómico para los organismos considerados en el ARP es por lo general la especie. El uso de un nivel taxonómico superior o inferior debería justificarse con argumentos científicos sólidos" por lo tanto, también resulta inviable incluir organismos a nivel de género sin definir las especies.</p> <p>- Respecto a la inclusión de <i>Fusarium oxysporum</i> f.sp. cubense Raza 4 Tropical (Foc R4T), en el cuadro 1 y la mención de</p>
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			<p>que las medidas de mitigación apropiadas para este patógeno son áreas libres o lugares de producción libres (Cuadro 3), respetuosamente se manifiesta la preocupación del mensaje erróneo que se está difundiendo. Lo anterior, teniendo en cuenta que investigaciones realizadas por el Laboratorio de Bioseguridad Vegetal del Departamento de Agricultura, Pesca y Silvicultura de Australia (DAFF, por su sigla en inglés), en las que se analizaron 451 muestras de tejido de fruto de banano Cavendish provenientes de plantas infectadas con Foc R4T, se concluyó que este patógeno no infecta el fruto (DAFF, 2018). Estudios adicionales confirman que incluso, en estados avanzados de la enfermedad, el fruto permanece libre de infección por Foc R4T (Daly & Walduck, 2006; Dita et al., 2010).</p> <p>La incorporación de esta plaga como asociada a la fruta fresca de Musa spp. para consumo humano constituye una medida injustificada que impone restricciones desproporcionadas al comercio internacional, con impactos sociales y económicos significativos para los países productores. Esta medida compromete la competitividad del sector, genera incertidumbre en los mercados y pone en riesgo miles de empleos directos e indirectos vinculados a esta cadena productiva.</p> <p>El informe del Comité de Normas celebrado del 12 al 16 de mayo de 2025, en Roma, Italia, indica que "Some SC members expressed doubt about whether Musa fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of Musa to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending consultation comments". No obstante, se considera que difundir esta información a nivel mundial sin una previa validación es una práctica no acertada, que genera confusiones y desinformación, promoviendo así medidas injustificadas por parte de países importadores y la utilización de los escasos recursos en implementar acciones que no se requieren o en su defecto haciendo las exportaciones inviables. Si bien se reconoce el derecho soberano de los países a establecer medidas fitosanitarias para proteger la sanidad vegetal, dicho derecho debe ejercerse sobre la base de criterios científicos y sin constituir obstáculos innecesarios al comercio internacional.</p>
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			<p>Por lo tanto, y en concordancia con los principios establecidos en la NIMF No. 1, se solicita de manera categórica no difundir información contraria a la evidencia científica existente, la cual demuestra que Foc R4T no afecta el fruto fresco de Musa spp., y requerir este tipo de medidas fitosanitarias para esta plaga constituye una barrera al comercio, carente de justificación científica y contraria a los principios de la CIPF.</p> <p>- Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>- Respecto a las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas</p>
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			<p>medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p>- De igual modo, la propuesta de anexo señala la posibilidad de implementar tratamientos de irradiación, la cual no es viable debido a la ausencia de respaldo científico sobre su impacto en las características organolépticas y fisiológicas del producto; lo anterior, trae consigo imprecisiones en la solicitud de medidas de mitigación técnicamente injustificadas y repercusiones económicas en los países exportadores.</p> <p>- Persistir en la idea de elaborar normas por especie, conduce a restar importancia a los estándares aprobados como las NIMF No. 2 y No. 11, alejándose de los fundamentos y principios del Acuerdo MSF.</p> <p>El comercio histórico de fruta fresca de banano muestra que esta norma es innecesaria, pues en la actualidad los países han venido aplicando los estándares de las normas publicados por la CIPF, relacionados con este tipo de comercio (NIMF No. 2, 11, 14, 21). Colombia presenta un comercio histórico de fruta fresca de banano significativo en los diferentes continentes. Para el 2024 el país registró exportaciones a 55 países por más de 1,1 millones de toneladas, y en el periodo de enero a julio de 2025 se han exportado cerca de un millón de toneladas. La emisión de este documento coloca en riesgo la sostenibilidad de más de 80.000 hectáreas registradas para exportación, que actualmente genera cerca de 63.500 empleos directos y 195.000 indirectos en el país y la inversión en programas sociales en materia de vivienda, educación, salud y recreación que beneficia a más 200.000 familias, como resultado de las exportaciones de fruta fresca de Musa spp. de origen Colombia.</p> <p>Teniendo en cuenta los argumentos expuestos, Colombia manifiesta su desacuerdo total con el documento titulado "Movimiento internacional del fruto fresco de Musa spp. (2023-028)" y deja constancia de la solicitud de no expedir normas con estas características.</p> <p>Sumado a las consideraciones previamente expuestas, respetuosamente se manifiesta que la imagen publicada en la página web de la CIPF para acompañar la consulta pública del proyecto de anexo sobre el movimiento internacional de fruto fresco de Musa spp. no representa el comercio internacional de este producto. La fotografía en cuestión genera una percepción equivocada, ya que no refleja los estándares técnicos que rigen este comercio, los cuales incluyen buenas prácticas agrícolas, medidas fitosanitarias estrictas, requisitos de maduración</p>
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			<p>fisiológica, así como otros criterios internacionales que garantizan la calidad e inocuidad del banano exportado.</p> <p>Finalmente, reiteramos que Colombia a través del ICA manifestó su desacuerdo total con la emisión de la NIMF No. 46 "Normas para medidas fitosanitarias específicas para productos", lo que fue informado a la CIPF en el oficio ICA No. 20182116449 del 28 de agosto de 2018, sobre el cual la señora Sandra Goritschnig, del Standard Setting Associate de la CIPF acuso recibido en su momento. Así mismo, en el 2017 el ICA también manifestó su inconformidad con el proyecto de publicación de la NIMF titulado "Movimiento Internacional de Flores Cortadas (2008-005)", posición que fue presentada en el taller regional de la CIPF para América Latina, celebrado en septiembre de 2017, en Cusco, Perú, reportada en el SCL de la CIPF y ratificada a través de oficio ICA No. 20172116384 del 5 de octubre de 2017, dirigido al señor Ezequiel Ferro, Secretario de Coordinación del Comité de Normas en su momento. En esa ocasión el mencionado proyecto de NIMF fue archivado, validando así la argumentación técnica presentada por Colombia.</p> <p><i>Category : SUBSTANTIVE</i></p>
38	G	(General Comment)	<p>C Cameroon</p> <p>Cette norme est utile pour harmoniser le commerce intra-régional des bananes et des plantains. Toutefois, elle ne traite pas du commerce des Musa en régimes, alors que c'est la forme la plus commercialisée dans le commerce transfrontalier africain. Un accent doit être mis sur cette modalité, pour que le projet soit bénéfique pour le continent Africain</p> <p><i>Category : TECHNICAL</i></p>
39	G	(General Comment)	<p>C Cameroon</p> <p>L'usage prévu des bananes fraîches Musa spp. est la consommation humaine. Les doigts de bananes ne sont pas un matériel végétatif viable, donc il n'y a pas de justification technique d'inclure les champignons dans cette liste</p> <p><i>Category : TECHNICAL</i></p>
40	G	(General Comment)	<p>C Gabon</p> <p>Nous validons le draft d'annexe de la NIMP 46</p> <p><i>Category : TECHNICAL</i></p>
41	1	DRAFT ANNEX TO ISPM 46: International movement of fresh Musa spp. fruit (2023-028)	<p>C Russian Federation</p> <p>General Comment: The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p> <p><i>Category : SUBSTANTIVE</i></p>
42	1	DRAFT ANNEX TO ISPM 46: International movement of fresh Musa spp. fruit (2023-028)	<p>C Tunisia</p> <p>Tunisia endorses NEPPPO's comments on this draft</p> <p><i>Category : SUBSTANTIVE</i></p>



43	1	DRAFT ANNEX TO ISPM 46: International movement of fresh <i>Musa</i> spp. fruit (2023-028)	C	 Brazil NEPPO Listing several pest associated with the commodities in the annex may be used as a technical justification by importing countries for regulating them, even though the standard explains this point clearly. It is therefore recommended to list only those pest species that have a significant impact and are regulated by multiple countries. <i>Category : TECHNICAL</i>
44	1	DRAFT ANNEX TO ISPM 46: International movement of fresh <i>Musa</i> spp. fruit (2023-028)	C	 Brazil NEPPO this annex represents an important step to word strengthening phytosanitary measures related to the trade of fresh musa as it provide a clear framework for inspection and control procedures. <i>Category : EDITORIAL</i>
45	1	DRAFT ANNEX TO ISPM 46: International movement of fresh <i>Musa</i> spp. fruit (2023-028)	C	 Brazil Malawi We support Draft Annex to ISPM 46 <i>Category : TECHNICAL</i>
46	1	PROYECTO DE ANEXO A LA NIMF 46: Movimiento internacional del fruto fresco de <i>Musa</i> spp. (2023-028)	C	Honduras El proyecto de anexo a la NIMF 46 se deberá explicar ampliamente sus objetivos finales, ya que así como se esta redactada la propuesta consideramos que representa obstáculos al comercio, ya que contempla plagas que no están asociadas al banano, ya que no afecta al cultivo y al fruto. <i>Category : EDITORIAL</i>
47	1	PROYECTO DE ANEXO A LA NIMF 46: Movimiento internacional del fruto fresco de <i>Musa</i> spp. (2023-028)	C	Dominican Republic Consideramos que este anexo no debe ser incluido en la NIMF 46. Ya que contempla organismos asociados que no afectan al fruto ni al cultivo. Ademas propone medidas que son consideradas muy restrictivas para el comercio. Lo que puede afectar la economia de los paises. <i>Category : SUBSTANTIVE</i>
48	1	PROJET D'ANNEXE À LA NIMP 46: Déplacements internationaux de fruits frais de <i>Musa</i> spp. (2023-028)	C	Madagascar Cette norme est très important mais pourquoi on n'a pas mis aussi les bananiers; <i>Category : SUBSTANTIVE</i>
49	11	2024-04 The Commission on Phytosanitary Measures (CPM) , CPM-18 added topic Annex <i>International movement of fresh banana (Musa paradisiaca) fruit (2023-028)</i> to ISPM 46 (<i>Commodity-specific standards for phytosanitary measures</i>) to the work programme, priority 1.	P	Colombia When mentioning an acronym in a document for the first time, the full name must be written. <i>Category : EDITORIAL</i>
50	11	2024-04: La CMFComisión de Medidas Fitosanitarias (CMF) , en su 18.ª reunión, añadió el tema "Anexo <i>Movimiento internacional del fruto fresco del plátano (Musa paradisiaca) (2023-028)</i> a la NIMF 46 (<i>Normas para medidas fitosanitarias específicas para productos</i>)" al programa de trabajo, con prioridad 1.	P	Colombia Al mencionar por primera vez una sigla en un documento se debe escribir el nombre completo. <i>Category : EDITORIAL</i>
1. Scope				

51	26	This commodity standard provides guidance for national plant protection organizations (NPPOs) on pests associated with the fresh fruit of <i>Musa</i> spp. (Zingiberales: Musaceae) Musaceae (hereafter fresh fruit) and options for phytosanitary measures for the to manage these pests in international movement trade . It applies to hands, clusters or singles of fresh fruit intended for consumption or processing. The standard does not apply to bunches (see appendix 1), or fruit that has been processed (e.g. canned, chopped, dried, frozen or mashed). Musa spp. fruit.	P	Australia Though ISPM 46 outlines the inclusions for the sections of Annexes "Scope" and "Description of the commodity and its intended use, in practice, it is difficult to avoid duplication in these sections. It is proposed that ISPM 46 be revised either with better guidance on the different information to be included in these sections or to combine the sections. In the interim, we propose combination of the two sections in the Annexes to reduce duplication. <i>Category : SUBSTANTIVE</i>
52	26	This commodity standard provides guidance for national plant protection organizations National Plant Protection Organizations (NPPOs) on pests associated with the fresh fruit of <i>Musa</i> spp. (Zingiberales: Musaceae) and options for phytosanitary measures for the international movement of fresh <i>Musa</i> spp. fruit.	P	Colombia The first letter of each word must be capitalized. <i>Category : EDITORIAL</i>
53	26	This commodity standard provides guidance for national plant protection organizations (NPPOs) on pests associated with the fresh fruit of Musa spp. (Zingiberales: Musaceae) and options for phytosanitary measures for the international movement of fresh Musa spp. fruit. This standard provides guidance to national plant protection organisations (NPPOs) on pests associated with fresh fruit of Musa spp. (Zingiberales: Musaceae) (hereafter fresh fruit), and options for phytosanitary measures to manage these pests in international trade. It applies to hands, clusters or singles of fresh fruit intended for consumption or processing. The standard does not apply to bunches (see Appendix 1), or fruit that has been processed (e.g. canned, chopped, dried, frozen, or mashed).	P	PPPO Created by merging other changes together <i>Category : SUBSTANTIVE</i>
54	26	This commodity standard provides guidance for national plant protection organizations (NPPOs) on pests associated with the fresh fruit of <i>Musa</i> spp. (Zingiberales: Musaceae) and options for phytosanitary measures for the international movement of fresh <i>Musa</i> spp. fruit.	C	PPPO Edited for clarity <i>Category : SUBSTANTIVE</i>
55	26	This commodity standard provides guidance for national plant protection organizations (NPPOs) on pests associated with the fresh fruit of <i>Musa</i> spp. (Zingiberales: Musaceae) and options for phytosanitary measures for the international movement of fresh <i>Musa</i> spp. fruit.	C	PPPO PPPO suggests the revised scope to read as: This standard provides guidance to national plant protection organisations (NPPOs) on pests associated with fresh fruit of <i>Musa</i> spp. (Zingiberales: Musaceae) (fresh fruit), and options for phytosanitary measures to manage these pests in international trade. It applies to hands, clusters or singles of fresh fruit intended for consumption or processing. The standard does not apply to bunches (see Appendix 1), or fruit that has been processed (e.g. canned, chopped, dried, frozen, or mashed). <i>Category : SUBSTANTIVE</i>
56	26	This commodity standard provides guidance for national plant protection	P	New Zealand

		organizations (NPPOs) on pests associated with the fresh fruit of <i>Musa</i> spp. (Zingiberales: Musaceae) fruit and options for phytosanitary measures for the international movement of fresh <i>Musa</i> spp. fruit.		To align with the mango standard. <i>Category : EDITORIAL</i>
57	26	This commodity standard provides guidance for national plant protection organizations (NPPOs) on pests associated with the fresh fruit of <i>Musa</i> spp. (Zingiberales: Musaceae) (hereafter, fresh fruit) and options for phytosanitary measures to manage these pests for the international movement of fresh trade. <i>Musa</i> spp. fruit.	P	Fiji Suggested amended wordings. <i>Category : EDITORIAL</i>
58	26	En esta norma para productos se proporciona orientación para las organizaciones nacionales-Organizaciones Nacionales de protección fitosanitaria-Protección Fitosanitaria (ONPF) sobre las plagas asociadas al fruto fresco de <i>Musa</i> spp. (Zingiberales: Musaceae) y las opciones de medidas fitosanitarias para el movimiento internacional del fruto fresco de <i>Musa</i> spp.	P	Colombia Primera letra de cada palabra debe estar en mayúscula. <i>Category : EDITORIAL</i>
59	26	En esta norma para productos se proporciona orientación para las organizaciones nacionales de protección fitosanitaria (ONPF) sobre las plagas asociadas al fruto fresco de <i>Musa</i> spp. (Zingiberales: Musaceae) y las opciones de medidas fitosanitarias para el movimiento internacional del fruto fresco de <i>Musa</i> spp.	C	Ecuador Inclusión de fruta fresca en estado inmaduro (verde). El comercio internacional de musáceas se lo realiza con fruta verde en estado inmaduro, ya que alarga la vida de la fruta en percha y evita la infección y diseminación de algunas plagas asociadas al producto. De igual manera, en los países importadores, esta prohibido el ingreso de fruta madura o con síntomas de iniciar procesos de maduración. Texto sugerido: En esta norma para productos se proporciona orientación para las organizaciones nacionales de protección fitosanitaria (ONPF) sobre las plagas asociadas al fruto fresco de <i>Musa</i> spp. (Zingiberales: Musaceae) y las opciones de medidas fitosanitarias para el movimiento internacional de fruta fresca en estado inmaduro (verde) de <i>Musa</i> spp. De acogerse esta observación, se debe aplicar a todo el documento. <i>Category : TECHNICAL</i>
60	26	La présente norme de marchandise fournit aux organisations nationales de la protection des végétaux (ONPV) des indications concernant les organismes nuisibles associés aux fruits de <i>Musa</i> spp. (Zingiberales: Musaceae) frais et propose des mesures phytosanitaires envisageables pour les déplacements internationaux de fruits de <i>Musa</i> spp. frais.	P	IPPC Regional Workshop Africa confère la définition de ONPV dans la NIMP 5 <i>Category : EDITORIAL</i>
2. Description of the commodity and its intended use				
61	27	2. Description of the commodity and its intended use	P	PPPO As per comment below. <i>Category : SUBSTANTIVE</i>
62	28	<u>This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in</u>	P	China

		<u>clusters, see Figures 2 and Figure 3 in Appendix 1). It does not apply to bunches (see Figure 1 in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).</u>		<i>Category : SUBSTANTIVE</i>
63	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. <u>peeled</u> , canned, chopped, dried, frozen, mashed).	P	China <i>Category : SUBSTANTIVE</i>
64	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	Australia Though ISPM 46 outlines the inclusions for the sections of Annexes "Scope" and "Description of the commodity and its intended use, in practice, it is difficult to avoid duplication in these sections. It is proposed that ISPM 46 be revised either with better guidance on the different information to be included in these sections or to combine the sections. In the interim, we propose combination of the two sections in the Annexes to reduce duplication. <i>Category : SUBSTANTIVE</i>
65	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. <u>green 0 or 1</u> (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	Colombia Considering that the international fresh fruit movement of <i>Musa</i> spp. is carried out exclusively in green physiological state 0 or 1, it is essential that the product description includes the degree of physiological maturity as a determining factor to not include pests that do not follow the route of entry. <i>Category : TECHNICAL</i>
66	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	Colombia As indicated in the draft standard, the intended use of the fresh fruit of <i>Musa</i> spp. is human consumption, which is a key factor in determining the risk of pest introduction. For this reason, and considering that the fresh fruit of <i>Musa</i> spp. it is not viable for planting and its use is intended exclusively for human consumption, there is no technical justification to include fungi and bacteria in the ISPM project. This is consistent with the provisions of the International Standard for Phytosanitary

				Measures (ISPM) No. 1 "Phytosanitary Principles for the Protection of Plants and the Application of Phytosanitary Measures in International Trade". <i>Category : TECHNICAL</i>
67	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters) <u>parts of hands</u> . It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	Colombia Translation Enhancement <i>Category : TRANSLATION</i>
68	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed) <u>mashed) in accordance with ISPM 32.</u>	P	NEPPO <i>Category : TECHNICAL</i>
69	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in (in hands or in clusters) . It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	EPPO Keeping eg., it seems that there are other types of commodities, but the standard applies exclusively to hands and clusters <i>Category : TECHNICAL</i>
70	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	C	IPPC Regional Workshop Africa Recommendation to invite the SC to consider bunches to be trades internationally <i>Category : TECHNICAL</i>
71	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in (in hands or in clusters) <u>clusters or fingers</u>). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	IPPC Regional Workshop Africa Revised change by South Africa on 23 Aug 2025 21:28 <i>Category : TECHNICAL</i>
72	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It	P	PPPO There is a lot of repetition between the scope and the description of the commodity. It is proposed that ISPM 46 is revised to combine these two sections. In the interim, the annex should combine the two sections to avoid the repetition.

		does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).		Category : <i>SUBSTANTIVE</i>
73	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in (in hands or in clusters)). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	 Cameroon South Africa Proposal for deletion of "e.g." and "traded internationally" as Bunches can still be traded, but for this purpose it has been excluded. Category : <i>TECHNICAL</i>
74	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in clusters). It does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to <u>fresh</u> fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed). <u>Commercial fresh fruit of Musa is harvested in their initial green phase, "green stage one," before they begin to ripen naturally.</u>	P	 Costa Rica COSAVE 1) For consistency 2)Text added to clarify how Musa fruit is traded internationally. Fruit in the initial green phase are moved under controlled conditions and ripening is stimulated by exposure to exogenous ethylene in ripening chambers (EFSA, 2021) Category : <i>TECHNICAL</i>
75	28	This commodity standard applies to the fresh fruit of <i>Musa</i> spp. (e.g. in hands or in elusters). <u>It clusters) produced for international trade and is intended for consumption or processing and it</u> does not apply to bunches (see figures in Appendix 1), because they are not traded internationally. It applies to fruit that has been produced for international trade and is intended for consumption or processing in an importing country. It does not apply to fruit that has already been processed (e.g. canned, chopped, dried, frozen, mashed).	P	Fiji Suggested amended wordings. Category : <i>EDITORIAL</i>
76	28	Esta norma para productos se aplica al fruto fresco de Musa spp. (por ejemplo, en manos o en partes de manos). No se aplica a los racimos (véanse las figuras en el Apéndice 1) porque estos no se comercializan internacionalmente. Se aplica al fruto que haya sido producido para el comercio internacional y esté destinado al consumo o al procesamiento en un país importador. No se aplica al fruto que ya haya sido procesado (por ejemplo, enlatado, troceado, desecado, congelado o en puré).	P	Colombia Según lo indicado en el proyecto de norma, el uso previsto de la fruta fresca de <i>Musa</i> spp. es el consumo humano, lo cual constituye un factor clave para determinar el riesgo de introducción de plagas. Por esta razón, y considerando que la fruta fresca de <i>Musa</i> spp. no es viable para la siembra y su uso está destinado exclusivamente al consumo humano, no existe justificación técnica para incluir hongos y bacterias en el proyecto de NIMF. Esto es coherente con lo establecido en la Norma Internacional para Medidas Fitosanitarias (NIMF) No. 1 "Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional". Category : <i>TECHNICAL</i>
77	28	Esta norma para productos se aplica al fruto fresco de <i>Musa</i> spp. <u>verde 0 o 1</u> (por ejemplo, en manos o en partes de manos). No se aplica a los racimos (véanse las figuras en el Apéndice 1) porque estos no se comercializan internacionalmente. Se aplica al fruto <u>fresco no maduro</u> que haya sido producido para el comercio	P	Colombia Teniendo en cuenta que el movimiento internacional de fruta fresca de <i>Musa</i> spp. se realiza exclusivamente en estado fisiológico verde 0 o 1, es fundamental que en la descripción del producto se incluya el grado de madurez fisiológica como un factor

		internacional y esté destinado al consumo o al procesamiento en un país importador. No se aplica al fruto que ya haya sido procesado (por ejemplo, enlatado, troceado, desecado, congelado o en puré).		determinante para no incluir plagas que no siguen la vía de ingreso. <i>Category : TECHNICAL</i>
78	28	Esta norma para productos se aplica al fruto fresco de <i>Musa</i> spp. (por ejemplo, en manos o en partes de manos). No se aplica a los racimos (véanse las <i>(ver</i> figuras en el Apéndice 1) porque estos no se comercializan internacionalmente. Se aplica al fruto que haya sido producido para el comercio internacional y esté destinado al consumo o al procesamiento en un país importador. No se aplica al fruto que ya haya sido procesado (por ejemplo, enlatado, troceado, desecado, congelado o en puré).	P	Colombia Mejora de traducción <i>Category : TRANSLATION</i>
79	28	Esta norma para productos se aplica al fruto fresco de <i>Musa</i> spp. (por ejemplo, en <i>en</i> manos o en partes de manos). No se aplica a los racimos (véanse las figuras en el Apéndice 1) porque estos no se comercializan internacionalmente. Se aplica al fruto que haya sido producido para el comercio internacional y esté destinado al consumo o al procesamiento en un país importador. No se aplica al fruto que ya haya sido procesado (por ejemplo, enlatado, troceado, desecado, congelado o en puré).	P	Colombia Mejora de traducción <i>Category : TRANSLATION</i>
80	28	Esta norma para productos se aplica al fruto fresco de <i>Musa</i> spp. (por ejemplo, en manos o en partes de manos). No se aplica a los racimos (véanse las figuras en el Apéndice 1) porque estos no se comercializan internacionalmente. Se aplica al fruto que haya sido producido para el comercio internacional y esté destinado al consumo o al procesamiento en un país importador. No se aplica al fruto que ya haya sido procesado (por ejemplo, enlatado, troceado, desecado, congelado o en puré).	C	Ecuador Cambiar manos por clusters. Conjunto de frutos de musáceas. Incluir la categorización según la NIMF 32, siendo categoría 3 para fruta y procesado categoría 1. texto sugerido: Esta norma para productos se aplica al fruto fresco en estado inmaduro de <i>Musa</i> spp. (por ejemplo, en clusters o en partes de clusters) que esta en la categoría 3 de acuerdo a la NIMF 32. No se aplica a los racimos (véanse las figuras en el Apéndice 1) porque estos no se comercializan internacionalmente. Se aplica al fruto que haya sido producido para el comercio internacional y esté destinado al consumo o al procesamiento en un país importador. No se aplica al fruto que ya haya sido procesado (por ejemplo, enlatado, troceado, desecado, congelado o en puré). <i>Category : TECHNICAL</i>
81	28	La présente norme de marchandise s'applique aux fruits frais de <i>Musa</i> spp. (qui peuvent être commercialisés par exemple en mains ou en grappes plus petites). Elle ne s'applique pas aux régimes (voir les images à l'appendice 1), car les fruits ne sont pas commercialisés au niveau international sous cette forme. La norme s'applique aux fruits produits pour le marché international et destinés à la consommation ou à la transformation dans un pays importateur. Elle ne s'applique pas aux fruits déjà transformés (par exemple appertisés, émincés, séchés, surgelés ou en purée).	C	IPPC Regional Workshop Africa La présente norme de marchandise s'applique aux fruits frais de <i>Musa</i> spp. (qui peuvent être commercialisés, par exemple, en mains ou en grappes plus petites). Elle ne s'applique pas aux régimes (voir les images en appendice 1), car les fruits ne sont pas commercialisés à l'échelle internationale sous cette forme. La norme s'applique aux fruits produits pour le marché international et destinés soit à la consommation, soit à la transformation dans un pays importateur. Elle ne s'applique pas aux fruits déjà

				transformés (par exemple conserves, émincés, séchés, surgelés ou en purée). <i>Category : EDITORIAL</i>
82	28	La présente norme de marchandise s'applique aux fruits frais de <i>Musa</i> spp. (qui peuvent commercialisés par exemple en mains ou en grappes plus petites). Elle ne s'applique pas aux régimes (voir les images à l'appendice 1), car les fruits ne sont pas commercialisés au niveau international sous cette forme. La norme s'applique aux fruits produits pour le marché international et destinés à la consommation ou à la transformation dans un pays importateur. Elle ne s'applique pas aux fruits déjà transformés (par exemple appertisés, émincés, séchés, surgelés ou en purée).	C	Cameroon Dans le commerce Intra régional africain, les régimes de Musa font l'objet d'un volume important d'échanges. Examiner l'insertion de cette modalité dans le commerce des Musa <i>Category : TECHNICAL</i>
3. Pests associated with fresh Musa spp. fruit				
83	29	3. Pests associated with fresh Musa spp. fruit	P	Colombia As indicated in the draft standard, the intended use of the fresh fruit of <i>Musa</i> spp. is human consumption, which is a key factor in determining the risk of pest introduction. For this reason, and considering that the fresh fruit of <i>Musa</i> spp. is not viable for planting and its use is intended exclusively for human consumption, there is no technical justification for including fungi and bacteria in the ISPM project. This is consistent with the provisions of the International Standard for Phytosanitary Measures (ISPM) No. 1 "Phytosanitary Principles for the Protection of Plants and the Application of Phytosanitary Measures in International Trade". <i>Category : TECHNICAL</i>
84	29	3. Plagas asociadas al fruto fresco de Musa spp.	P	Colombia Según lo indicado en el proyecto de norma, el uso previsto de la fruta fresca de <i>Musa</i> spp. es el consumo humano, lo cual constituye un factor clave para determinar el riesgo de introducción de plagas. Por esta razón, y considerando que la fruta fresca de <i>Musa</i> spp. no es viable para la siembra y su uso está destinado exclusivamente al consumo humano, no existe justificación técnica para incluir hongos y bacterias en el proyecto de NIMF. Esto es coherente con lo establecido en la Norma Internacional para Medidas Fitosanitarias (NIMF) No. 1 "Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional". <i>Category : TECHNICAL</i>
85	29	3. Plagas asociadas al fruto fresco de <i>Musa</i> spp.	C	Dominican Republic En caso de que este anexo prosiga, es necesario una revisión exhaustiva de la tabla 1. Lista de plagas asociadas a frutas frescas de <i>Musa</i> sp. especialmente: mosca de frutas, hongos y el caracol gigante africano. La mayoría de las moscas de las frutas consideradas en este anexo no siguen la vía de frutas frescas, por lo que no deben ser incluidas. Al actualizarse este anexo se deberá tomar en consideración los requisitos de importación de las

			partes contratantes y el historial de detección de plagas de frutos de musáceas en los países, para utilizar esa información como base de la tabla. 0 0 Category : <i>SUBSTANTIVE</i>
86	30	The pests included in Table 1 are considered to be associated with fresh <i>Musa spp.</i> fruit and are regulated in international trade by at least one contracting party based on technical justification. The list of pests is not exhaustive, nor country specific. fruit and are regulated in international trade by at least one contracting party based on technical justification. The list of pests is not exhaustive, nor country specific.	P Australia Use "fresh fruit of Musa spp.," once and from then on refer to "fruit" to reduce complexity. Category : <i>SUBSTANTIVE</i>
87	30	The pests included in Table 1 are considered to be associated with fresh <i>Musa spp.</i> fruit and are regulated in international trade by at least one contracting party based on technical justification. The list of pests is not exhaustive, nor country specific.	P Colombia Including pests in a regulation of international magnitude and impact, based on the fact that they are part of phytosanitary requirements, is not a technically justified criterion, because in operational reality many of these requirements are based on old requirements, supported by outdated sources that do not meet adequate scientific or reliability standards to require phytosanitary measures. According to Zlotina (2015) in her article entitled "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" the way in which information is handled (cited, analyzed, discussed) can have serious and long-lasting consequences for NPPOs. Information about pests, including their condition in an area or in a host, can be cited in one source, and then this source is cited again in others without having been validated or verified. This results in "circular references" in which the original source of information may be lost, but the record is perpetuated in secondary sources, which often cite themselves. "Circular" information regarding historical records of the presence or absence of pests, or the status of plants as pest hosts, may not be accurate from the outset or outdated. When these records are repeatedly cited in the scientific literature, they become part of the scientific literature and are extremely difficult to correct. The context presented by Zlotina (2015) is the same as that generated when pests are included and phytosanitary measures are required for international trade only because another NPPO requests them without knowing the background of how these phytosanitary requirements were established, and without carrying out a systematic process of feedback from the primary sources of the requirements. Therefore, it is essential to use the ARP as an operational principle, which is the current tool that allows NPPOs to technically and scientifically analyze the information that exists on the condition of a pest in an area, the

				<p>pest-host relationship, the criteria on the route of entry of the pest, the categorization of the pest and the need and objectivity of mitigation measures. thus enabling transparent, fair and science-based trade.</p> <p>Validating pests without due consideration of the quality and technical reliability of the information goes against the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) of the World Trade Organization (WTO), the basic principle of technical justification and the operational principle of risk analysis established in ISPM No. 1, "Phytosanitary Principles for the Protection of Plants and the Application of Phytosanitary Measures in International Trade" and ISPMs Nos. 2 and 11. <i>Category : SUBSTANTIVE</i></p>
88	30	The pests included in Table 1 are considered to be associated with fresh <u>(unripe)</u> <i>Musa</i> spp. fruit and are regulated in international trade by at least one contracting party based on technical justification. The list of pests is not exhaustive, nor country specific.	P	<p>Colombia</p> <p>Considering that the international fresh fruit movement of <i>Musa</i> spp. is carried out exclusively in green physiological state 0 or 1, it is essential that the product description includes the degree of physiological maturity as a determining factor to not include pests that do not follow the route of entry. <i>Category : TECHNICAL</i></p>
89	30	The pests included in Table 1 are considered to be associated with fresh <i>Musa</i> spp. fruit and are regulated in international trade by at least one contracting party based on technical justification. The list of pests is not exhaustive, nor country specific. -fruit and are regulated in international trade by at least one contracting party based on technical justification. The list of pests is not exhaustive, nor country specific.	P	<p>Fiji</p> <p>Reflecting the previous suggestion (hereafter, fresh fruit) <i>Category : EDITORIAL</i></p>
90	30	Las plagas que figuran en el Cuadro 1 se consideran asociadas al fruto fresco de <i>Musa</i> spp. y están reglamentadas en el comercio internacional por al menos una de las partes contratantes sobre la base de una justificación técnica. La lista de plagas no es exhaustiva ni específica de ningún país.	P	<p>Colombia</p> <p>incluir plagas en una regulación de magnitud e impacto internacional, teniendo como base que estas hacen parte de requisitos fitosanitarios, no es un criterio técnicamente justificado, debido a que en la realidad operativa muchas de estas exigencias se basan en requisitos antiguos, soportados en fuentes desactualizadas que no cumplen con estándares científicos ni de confiabilidad adecuados para requerir medidas fitosanitarias.</p> <p>De acuerdo con Zlotina (2015) en su artículo titulado "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" la forma en que se maneja la información (citada, analizada, discutida) puede tener consecuencias graves y duraderas para las ONPF. La información sobre plagas, incluyendo su condición en un área o en un hospedante, puede citarse en una fuente, y luego esta fuente se vuelve a citar en otras sin haber sido validada o verificada. Esto da lugar a «referencias circulares» en las que la fuente original de</p>

				<p>información puede perderse, pero el registro se perpetúa en fuentes secundarias, que a menudo se citan a sí mismas. La información «circular» relativa a los registros históricos de presencia o ausencia de plagas, o a la situación de las plantas como hospedantes de plagas, puede no ser precisa desde el principio o estar desactualizada. Cuando estos registros se citan repetidamente en la literatura científica, pasan a formar parte de la misma y resulta extremadamente difícil corregirlos.</p> <p>El contexto presentado por Zlotina (2015), es el mismo que se genera cuando se incluyen plagas y se exigen medidas fitosanitarias para el comercio internacional solo porque otra ONPF la solicita desconociendo los antecedentes de cómo se establecieron esos requisitos fitosanitarios, y sin llevar a cabo un proceso sistemático de retroalimentación de las fuentes primarias de los requisitos. Por lo tanto, es fundamental emplear como principio operativo el ARP, el cual es la herramienta actual que permite a las ONPF analizar técnica y científicamente la información que existe sobre la condición de una plaga en un área, la relación plaga - hospedante, los criterios sobre la vía de ingreso de la plaga, la categorización de la plaga y la necesidad y objetividad de las medidas de mitigación, permitiendo así un comercio transparente, justo y basado en ciencia.</p> <p>Validar plagas sin considerar debidamente la calidad y fiabilidad técnica de la información, va en contravía del Acuerdo Sobre la Aplicación de Medidas Sanitarias y Fitosanitarias (Acuerdo MSF) de la Organización Mundial del Comercio (OMC), del principio básico de justificación técnica y del principio operativo de análisis de riesgo establecido en las NIMF No. 1, "Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional" y de las NIMF No. 2 y 11.</p> <p><i>Category : SUBSTANTIVE</i></p>
91	30	Las plagas que figuran en el Cuadro 1 se consideran asociadas al fruto fresco (<u>no maduro</u>) de <i>Musa</i> spp. y están reglamentadas en el comercio internacional por al menos una de las partes contratantes sobre la base de una justificación técnica. La lista de plagas no es exhaustiva ni específica de ningún país.	P	<p>Colombia</p> <p>Teniendo en cuenta que el movimiento internacional de fruta fresca de <i>Musa</i> spp. se realiza exclusivamente en estado fisiológico verde 0 o 1, es fundamental que en la descripción del producto se incluya el grado de madurez fisiológica como un factor determinante para no incluir plagas que no siguen la vía de ingreso.</p> <p><i>Category : TECHNICAL</i></p>
92	31	The list of pests does not consider factors that may influence pest infestation of fruit in the country of origin (e.g. cultivar or variety, geographical and ecological factors, agricultural and production practices). NPPOs in their particular risk analysis should evaluate specific factors such as cultivar, variety, geography, ecology, agricultural practices, among others, to determine mitigation measures.	P	<p>Colombia</p> <p><i>Category : EDITORIAL</i></p>

93	31	En la lista de plagas no se consideran los factores que puedan influir en la infestación del fruto por una plaga en el país de origen (por ejemplo, el cultivar o la variedad, factores geográficos y ecológicos o prácticas agrícolas y de producción). Las ONPF en su análisis de riesgo particular, deberían evaluar factores específicos como el cultivar, la variedad, la geografía, la ecología, las prácticas agrícolas, entre otros, para determinar las medidas de mitigación.	P	Colombia La redacción no es clara ni precisa, por lo tanto, se debe reformular para explicar mejor cómo los factores deben ser considerados por las ONPF. <i>Category : EDITORIAL</i>
94	32	Inclusion of a pest in Table 1 does not constitute technical justification for its regulation by importing countries using this standard. When determining whether to regulate a pest listed in this commodity standard, the The NPPO of the importing country should base its decision decide whether to regulate a pest based on technical justification using either supported by a pest risk analysis or, where applicable, or by another comparable examination and evaluation of available similar scientific information evaluation.	P	Australia Suggested rewording to reduce complexity <i>Category : SUBSTANTIVE</i>
95	32	Inclusion of a pest in Table 1 does not constitute technical justification for its regulation by importing countries using this standard. When determining whether to regulate a pest listed in this commodity standard, the NPPO of the importing country should base its decision on technical justification using either a pest risk analysis or, where applicable, another comparable examination and evaluation of available scientific information.	P	Colombia The information in this paragraph strongly confirms that the draft annex is not bringing a benefit to NPPOs, to the implementation of the SPS Agreement, or to the facilitation of international trade in agricultural products; on the contrary, it leads importing countries to consider the pest list and mitigation measures as a reliable source. upon ratification and issuance by the IPPC, and establish phytosanitary measures based on the annex. This would force exporting countries to allocate human, financial and logistical resources to implement mitigation measures that are not necessary, thus ignoring that the PRA is a principle and a non-negotiable tool, which guarantees transparency in the international trade of agricultural products. <i>Category : SUBSTANTIVE</i>
96	32	Inclusion of a pest in Table 1 does not constitute <u>sufficient</u> technical justification for its regulation by importing countries using this standard. When determining whether to regulate a pest listed in this commodity standard, the NPPO of the importing country should base its decision on technical justification using either a pest risk analysis or, where applicable, another comparable examination and evaluation of available scientific information.	P	NEPPO <i>Category : SUBSTANTIVE</i>
97	32	Inclusion of a pest in Table 1 does not constitute technical justification for its regulation by importing countries using this standard. When determining whether to regulate a pest listed in this commodity standard, the The NPPO of the importing country should base its decision decide whether to regulate a pest based on technical justification using either a supported by pest risk analysis or, where applicable, or another comparable examination and evaluation of available similar scientific information evaluation.	P	PPPO Suggested amended wording to replace the second sentence, to make less complex. <i>Category : SUBSTANTIVE</i>

98	32	Inclusion of a pest in Table 1 does not constitute technical justification for its regulation by importing countries using this standard. When determining whether to regulate a pest listed in this commodity standard, the NPPO of the importing country should base its decision on technical justification using either a pest risk analysis or, where applicable, another comparable examination and evaluation of available scientific information.	C	PPPO The second sentence is long and complex, and needs to be re-written. <i>Category : EDITORIAL</i>
99	32	La inclusión de una plaga en el Cuadro 1 no constituye justificación técnica alguna para su reglamentación por los países importadores que usen esta norma. Al determinar si reglamentar alguna de las plagas enumeradas en la presente norma para productos, la ONPF del país importador debería basar su decisión en una justificación técnica, utilizando un análisis de riesgo de plagas o, cuando proceda, otro tipo de examen y evaluación comparables de la información científica disponible.	C	Colombia Eliminar el cuadro 1, ya que La información de este párrafo ratifica contundentemente que el proyecto de anexo no está aportando un beneficio a las ONPF, a la implementación del Acuerdo MSF, ni a la facilitación del comercio internacional de productos agrícolas; por el contrario, conlleva a que los países importadores consideren la lista de plagas y las medidas de mitigación como una fuente confiable, al ser ratificada y emitida por la CIPF, y establezcan medidas fitosanitarias basadas en el anexo. Esto obligaría a los países exportadores a destinar recursos humanos, financieros y logísticos para implementar medidas de mitigación que no son necesarias, desconociendo así que el ARP es un principio y una herramienta no negociable, la cual garantiza la transparencia en el comercio internacional de productos agrícolas. <i>Category : SUBSTANTIVE</i>
100	32	La inclusión de una plaga en el Cuadro 1 no constituye justificación técnica alguna para su reglamentación por los países importadores que usen esta norma. Al determinar si reglamentar alguna de las plagas enumeradas en la presente norma para productos, la ONPF del país importador debería basar su decisión en una justificación técnica, utilizando un análisis de riesgo de plagas o, cuando proceda, otro tipo de examen y evaluación comparables de la información científica disponible.	C	Guatemala enumerar la nimf 6 para una vigilancia específica, nimf 08 Determinación de una plaga en un área y nimf 11 ARP <i>Category : TECHNICAL</i>
101	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	Costa Rica The pest list includes species that should not be considered when the intended use is consumption or some pests are considered contaminant pests.. <i>Category : SUBSTANTIVE</i>
102	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	China suggest adding <i>Coccus hesperidum</i> , <i>Rastrococcus invadens</i> , <i>Vinsonia stellifera</i> . Reason: 1. After verification, the reference to 'Protocol of phytosanitary requirements for export of fresh banana fruits from Indonesia to China', the pest of concern to the Chinese side include <i>Coccus hesperidum</i> , but this pest is not listed in Table 1. 2. After verification, the reference to Protocol of phytosanitary requirements for export of fresh banana fruits from Indonesia to

				China. The pest of concern to the Chinese side include <i>Rastrococcus invadens</i> , <i>Vinsonia stellifera</i> , but this pest is not listed in Table 1 <i>Category : SUBSTANTIVE</i>
103	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	Australia The pest lists and table are long and difficult to read. We appreciate the need to have them here as part of a standard, however to facilitate implementation and use, especially as more commodity standards are developed, we consider development of a database containing this information would support contracting parties. We request the IPPC secretariat to put this issue on the work program of the SC and the IC as a high priority. <i>Category : SUBSTANTIVE</i>
104	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	P	Colombia Including pests in a regulation of international magnitude and impact, based on the fact that they are part of phytosanitary requirements, is not a technically justified criterion, because in operational reality many of these requirements are based on old requirements, supported by outdated sources that do not meet adequate scientific or reliability standards to require phytosanitary measures. According to Zlotina (2015) in his article entitled "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" the way in which information is handled (cited, analyzed, discussed) can have serious and long-lasting consequences for NPPOs. Information about pests, including their condition in an area or in a host, can be cited in one source, and then this source is cited again in others without having been validated or verified. This results in "circular references" in which the original source of information may be lost, but the record is perpetuated in secondary sources, which often cite themselves. "Circular" information regarding historical records of the presence or absence of pests, or the status of plants as pest hosts, may not be accurate from the outset or outdated. When these records are repeatedly cited in the scientific literature, they become part of the scientific literature and are extremely difficult to correct. The context presented by Zlotina (2015) is the same as that generated when pests are included and phytosanitary measures are required for international trade only because another NPPO requests them without knowing the background of how these phytosanitary requirements were established, and without carrying out a systematic process of feedback from the primary sources of the requirements. Therefore, it is essential to use the ARP as an operational principle, which is the current tool that

				<p>allows NPPOs to technically and scientifically analyze the information that exists on the condition of a pest in an area, the pest-host relationship, the criteria on the route of entry of the pest, the categorization of the pest and the need and objectivity of mitigation measures. thus enabling transparent, fair and science-based trade.</p> <p>Validating pests without due consideration of the quality and technical reliability of the information goes against the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) of the World Trade Organization (WTO), the basic principle of technical justification and the operational principle of risk analysis established in ISPM No. 1, "Phytosanitary Principles for the Protection of Plants and the Application of Phytosanitary Measures in International Trade" and ISPMs Nos. 2 and 11.</p> <p>Table 1 "Pests considered to be associated with the fresh fruit of Musa spp." is imprecise and unreliable, because it does not present the scientific evidence that supports their pest status in the fresh fruit of Musa. In addition, this table includes pests that are specific to foliage and lists others whose scientific evidence indicates that they do not affect Musa spp. which leads to the international dissemination of arbitrary and unjustified measures on the basis that they are included in an ISPM.</p> <p><i>Category : SUBSTANTIVE</i></p>
105	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	<p>IPPC Regional Workshop Africa</p> <p>Establish a mechanism for periodic updating of pest lists to reflect emerging pests and distribution changes e.g. Fusarium TR4, Bactrocera dorsalis.</p> <p>Rational: Pest status and distributions change rapidly; a static list may become outdated, leading to trade challenges.</p> <p><i>Category : TECHNICAL</i></p>
106	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	<p>IPPC Regional Workshop Africa</p> <p>Proposal for taxonomic standardizing of the referencing.</p> <p>Proposal to include (Pests of Regional concern in Table 1).</p> <p><i>Category : SUBSTANTIVE</i></p>
107	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	<p>Philippines</p> <p>The Philippines recommends including additional pests such as Fungi – Family Botryosphaeriaceae, Lasiodiplodia theobromae; and Pest group – Order Lepidoptera, Family Crambidae, Nacoleia octasema, associated with banana scab disease.</p> <p><i>Category : SUBSTANTIVE</i></p>
108	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	<p>Kenya</p> <p>Establish a mechanism for periodic updating of pest lists to reflect emerging pests and distribution changes e.g. Fusarium TR4, Bactrocera dorsalis. Rational is Pest status and distributions change rapidly; a static list may become outdated, leading to</p>

				trade challenges. <i>Category : TECHNICAL</i>
109	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*	C	South Africa Proposal for taxonomic standardizing of the referencing. Proposal to include (Pests of Regional concern in Table 1). <i>Category : SUBSTANTIVE</i>
110	33	Table 1. Pests considered to be associated with fresh <i>Musa</i> spp. fruit*fruit pathway*	P	COSAVE To clarify that the pests listed in table 1 can enter and spread through fresh fruit of <i>Musa</i> spp., according to the definition of "pathway" in ISPM 5. In addition we suggest to remove from the list those pests that do not follow the pathway, although associated with the fruit <i>Category : TECHNICAL</i>
111	33	Cuadro 1. Plagas que se consideran asociadas al fruto fresco de <i>Musa</i> spp.	P	Colombia Incluir plagas en una regulación de magnitud e impacto internacional, teniendo como base que estas hacen parte de requisitos fitosanitarios, no es un criterio técnicamente justificado, debido a que en la realidad operativa muchas de estas exigencias se basan en requisitos antiguos, soportados en fuentes desactualizadas que no cumplen con estándares científicos ni de confiabilidad adecuados para requerir medidas fitosanitarias. De acuerdo con Zlotina (2015) en su artículo titulado "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" la forma en que se maneja la información (citada, analizada, discutida) puede tener consecuencias graves y duraderas para las ONPF. La información sobre plagas, incluyendo su condición en un área o en un hospedante, puede citarse en una fuente, y luego esta fuente se vuelve a citar en otras sin haber sido validada o verificada. Esto da lugar a «referencias circulares» en las que la fuente original de información puede perderse, pero el registro se perpetúa en fuentes secundarias, que a menudo se citan a sí mismas. La información «circular» relativa a los registros históricos de presencia o ausencia de plagas, o a la situación de las plantas como hospedantes de plagas, puede no ser precisa desde el principio o estar desactualizada. Cuando estos registros se citan repetidamente en la literatura científica, pasan a formar parte de la misma y resulta extremadamente difícil corregirlos. El contexto presentado por Zlotina (2015), es el mismo que se genera cuando se incluyen plagas y se exigen medidas fitosanitarias para el comercio internacional solo porque otra ONPF la solicita desconociendo los antecedentes de cómo se establecieron esos requisitos fitosanitarios, y sin llevar a cabo un proceso sistemático de retroalimentación de las fuentes primarias

				<p>de los requisitos. Por lo tanto, es fundamental emplear como principio operativo el ARP, el cual es la herramienta actual que permite a las ONPF analizar técnica y científicamente la información que existe sobre la condición de una plaga en un área, la relación plaga - hospedante, los criterios sobre la vía de ingreso de la plaga, la categorización de la plaga y la necesidad y objetividad de las medidas de mitigación, permitiendo así un comercio transparente, justo y basado en ciencia.</p> <p>Validar plagas sin considerar debidamente la calidad y fiabilidad técnica de la información, va en contravía del Acuerdo Sobre la Aplicación de Medidas Sanitarias y Fitosanitarias (Acuerdo MSF) de la Organización Mundial del Comercio (OMC), del principio básico de justificación técnica y del principio operativo de análisis de riesgo establecido en las NIMF No. 1, "Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional" y de las NIMF No. 2 y 11.</p> <p>El cuadro 1 "Plagas que se consideran asociadas al fruto fresco de Musa spp." es impreciso y no confiable, debido a que no presenta las evidencias científicas que soportan su condición de plagas en la fruta fresca de Musa. Adicional, este cuadro incluye plagas que son específicas de follaje y lista otras cuya evidencia científica señala que no afectan Musa spp. lo cual deriva nuevamente a difundir internacionalmente medidas arbitrarias e injustificadas basándose en que están incluidas en una NIMF. <i>Category : SUBSTANTIVE</i></p>
112	33	Cuadro 1. Plagas que se consideran asociadas al fruto fresco de <i>Musa</i> spp.	C	<p>Panama</p> <p>Se considera necesario una revisión exhaustiva del listado de plagas, las cuales requieren una justificación técnica de su relación con el producto, su capacidad de seguir la vía y cuyo uso previsto es consumo. <i>Category : SUBSTANTIVE</i></p>
113	33	Cuadro 1. Plagas que se consideran asociadas al fruto fresco de <i>Musa</i> spp.	C	<p>Dominican Republic</p> <p>En caso de que este anexo prosiga, es necesario una revisión exhaustiva de la tabla 1. Lista de plagas asociadas a frutas frescas de Musa sp. especialmente: mosca de frutas, hongos y el caracol gigante africano. La mayoría de las moscas de las frutas consideradas en este anexo no siguen la vía de frutas frescas, por lo que no deben ser incluidas. Al actualizarse este anexo se deberá tomar en consideración los requisitos de importación de las partes contratantes y el historial de detección de plagas de frutos de musáceas en los países para utilizar esa información como base de la tabla. <i>Category : SUBSTANTIVE</i></p>
114	34	Pest group	C	<p>Philippines</p> <p>The Philippines propose to include several pests with their corresponding treatment options:</p>

				1. (Hemiptera) - Coccidae - Philephedra broadwayi (Cockerell, 1896) - Export Inspection 2. (Lepidoptera) - Pyralidae - Mussidia nigrivenella Ragonot - Export Inspection; SA 3 3. (Orthoptera) - Tettigoniidae - Neoconocephalus affinis (Palisot de Beauvois, 1805) - Export Inspection 4. Chromista - Pythiaceae - Trachysphaera fructigena Tabor & Bunting - PFA; SA 3 5. Bacteria - Xanthomonadaceae - Xanthomonas campestris pv. musacearum (Yirgou & Bradbury 1968) Dye 1978 - PFA <i>Category : SUBSTANTIVE</i>
115	34	Grupo de plagas	C	Guatemala Las moscas de la fruta entre otros necesitan una revision ya que no son de un alto riesgo <i>Category : SUBSTANTIVE</i>
116	35	Especie Familia	P	Colombia La información que se incluye en la columna es el nivel taxonómico de familia, por lo tanto, la columna debe denominarse "Familia" y no "Especie". <i>Category : TRANSLATION</i>
117	35	Especie Familia	P	Guatemala los nombres enlistados corresponden a familia no especie <i>Category : EDITORIAL</i>
118	35	Especie	C	Chile Corresponde a Familia <i>Category : EDITORIAL</i>
119	35	Especie	C	Ecuador El apartado corresponde a la familia y no a la especie <i>Category : EDITORIAL</i>
120	37	Arthropoda: Arachnida Delete Arthropoda: Arachnida, include: Raoiella indica Hirst, 1924; Oligonychus orthius Rimando, 1962; Oligonychus velascoi Rimando, 1962; Tetranychus piercei McGregor, 1950. Reason	P	China Mites feed on leaves, and fresh Musa fruits are usually subjected to SA such as washing and air blowing before export, so the likelihood of entry with fresh Musa fruits is very low. References: https://plantwiseplusknowledgebank.org/doi/10.1079/pwkb.specie.s.46792#sec-5 <i>Category : SUBSTANTIVE</i>
121	37	Arthropoda: Arachnida	P	New Zealand Remove Arthropoda as this style does not align with other headings in this table. <i>Category : EDITORIAL</i>
122	42	Raoiella indica Hirst, 1924	P	Colombia Raoiella indica Hirst, 1924 is a strictly foliar species that is located exclusively on the underside of leaves, causing chlorosis and yellow spots on the foliage of its host plants (Peña et al., 2006; Welbourn, 2007). The available scientific evidence categorically demonstrates that "R. indica is a foliar pest and so far it has not been found in fruits during sampling" (EPPO, 2008). The few

				<p>reports for fruits lack scientific support, since this species is collected only in leaf tissue and there is no verifiable documentation of its presence in reproductive structures (EPPO, 2008). Therefore, there is no scientific evidence to show that <i>R. indica</i> can follow the route of entry associated with the presentation of the product (hand and hand parts). In addition, standard commercial banana production practices including cluster bagging, high-pressure water washing during post-harvest and other phytosanitary operations eliminate any residual possibility of the presence of this leaf species in Musa spp. fruits (USDA-APHIS, 2013).</p> <p>EPPO. (2008). Report of a Pest Risk Analysis for <i>Raoiella indica</i>. EPPO Bulletin 38: 408-417.</p> <p>USDA-APHIS. (2013). Pest Risk Assessment for Bananas from the Philippines to Guam, Hawaii, and the Northern Mariana Islands. Version 3.</p> <p>Welbourn, C. (2007). Red Palm Mite <i>Raoiella indica</i> (Acari: Tenuipalpidae). Florida Department of Agriculture and Consumer Services, Division of Plant Industry Pest Alert.</p> <p>Peña, J.E., Mannion, C.M., Howard, F.W. & Hoy, M.A. (2006). <i>Raoiella indica</i> (Prostigmata: Tenuipalpidae): The red palm mite: a potential invasive pest of palms and bananas. University of Florida IFAS Extension Publication IN681.</p> <p>Category : <i>SUBSTANTIVE</i></p>
123	42	<i>Raoiella indica</i> Hirst, 1924	C	<p>EPPO</p> <p>Please reconsider the use of brackets in the column 'species' – it seems different from the use in the Mango Commodity Standard but possibly there is a reason.</p> <p>Category : <i>EDITORIAL</i></p>
124	42	<i>Raoiella indica</i> Hirst, 1924	P	<p>Colombia</p> <p><i>Raoiella indica</i> Hirst, 1924 es una especie estrictamente foliar que se localiza exclusivamente en el envés de las hojas, causando clorosis y manchas amarillas en el follaje de sus plantas hospedantes (Peña et al., 2006; Welbourn, 2007). La evidencia científica disponible demuestra categóricamente que "<i>R. indica</i> es una plaga foliar y hasta ahora no ha sido encontrada en frutos durante los muestreos" (EPPO, 2008). Los escasos reportes para frutos carecen de sustento científico, dado que esta especie se colecta únicamente en tejido foliar y no existe documentación verificable de su presencia en estructuras reproductivas (EPPO, 2008). Por tanto, no existe evidencia científica que demuestre que <i>R. indica</i> pueda seguir la vía de ingreso asociada a la presentación del producto (mano y partes de mano). Adicionalmente, las prácticas estándar de producción comercial de banano incluyendo embolsado de racimos, lavado con agua a alta presión durante la postcosecha y otras operaciones fitosanitarias eliminan cualquier posibilidad residual de presencia de esta especie foliar en frutos de Musa spp. (USDA-APHIS, 2013).</p>

				<p>EPPO. (2008). Report of a Pest Risk Analysis for Raoiella indica. EPPO Bulletin 38: 408-417.</p> <p>USDA-APHIS. (2013). Pest Risk Assessment for Bananas from the Philippines to Guam, Hawaii, and the Northern Mariana Islands. Version 3.</p> <p>Welbourn, C. (2007). Red Palm Mite Raoiella indica (Acari: Tenuipalpidae). Florida Department of Agriculture and Consumer Services, Division of Plant Industry Pest Alert.</p> <p>Peña, J.E., Mannion, C.M., Howard, F.W. & Hoy, M.A. (2006). Raoiella indica (Prostigmata: Tenuipalpidae): The red palm mite: a potential invasive pest of palms and bananas. University of Florida IFAS Extension Publication IN681.</p> <p>Category : <i>SUBSTANTIVE</i></p>
125	44	Tetranychidae	P	<p>Costa Rica</p> <p>These pests should be deleted because they are associated to leaves and not to fruit</p> <p>Category : <i>TECHNICAL</i></p>
126	44	Tetranychidae	P	<p>COSAVE</p> <p>These pests should be deleted because they are associated to leaves and not to fruit (EPPO, 2010; EPPO, 2008)</p> <p>Category : <i>TECHNICAL</i></p>
127	44	Tetranychidae	P	<p>OIRSA</p> <p>Deberían ser eliminados las especies de esta familia, porque estas plagas están asociadas a hoja y no a frutos</p> <p>Category : <i>SUBSTANTIVE</i></p>
128	45	Oligonychus orthius Rimando, 1962	P	<p>Colombia</p> <p>Oligonychus orthius Rimando, 1962 is a strictly foliar species documented in various host plants in Asian regions such as the Philippines and Taiwan (Rimando, 1962; Lo & Ho, 1989). Scientific evidence categorically establishes that O. orthius is located exclusively in leaf tissue and there is no verifiable documentation of its presence in reproductive structures or commercial fruits, confirming that this species maintains a feeding behavior restricted to foliage in all hosts where it has been documented (Rimando, 1962; Lo & Ho, 1989). Therefore, there is no scientific evidence to show that O. orthius can follow the route of entry associated with the presentation of the product (hand and hand parts). Standard commercial production practices including cluster bagging, high-pressure water washing during postharvest operations, and other phytosanitary treatments eliminate any residual possibility of presence of this leaf species in Musa spp. fruits (USDA-APHIS, 2013).</p> <p>Rimando, L.C. (1962). The Tetranychidae mites of the Philippines. University of the Philippines, College of Agriculture, Technical Bulletin 11: 1-52.</p>

				<p>Lo, P.K.C. & Ho, C.C. (1989). The Spider Mite Family Tetranychidae in Taiwan I. The Genus Oligonychus. Journal of the Taiwan Museum 42(2): 59-76.</p> <p>USDA-APHIS. (2013). Pest Risk Assessment for Bananas from the Philippines to Guam, Hawaii, and the Northern Mariana Islands. Version 3. <i>Category : SUBSTANTIVE</i></p>
129	45	Oligonychus orthius Rimando, 1962	P	<p>COSAVE</p> <p>This pest should be deleted because it is associated to leaves and not to fruit (EPPO, 2010; EPPO, 2008) <i>Category : TECHNICAL</i></p>
130	45	Oligonychus orthius Rimando, 1962	P	<p>Colombia</p> <p>Oligonychus orthius Rimando, 1962 es una especie estrictamente foliar documentada en diversas plantas hospedantes en regiones asiáticas como Filipinas y Taiwán (Rimando, 1962; Lo & Ho, 1989). La evidencia científica establece categóricamente que O. orthius se localiza exclusivamente en tejido foliar y no existe documentación verificable de su presencia en estructuras reproductivas o frutos comerciales, confirmando que esta especie mantiene un comportamiento alimentario restringido al follaje en todos los hospedantes donde ha sido documentada (Rimando, 1962; Lo & Ho, 1989). Por tanto, no existe evidencia científica que demuestre que O. orthius pueda seguir la vía de ingreso asociada a la presentación del producto (mano y partes de mano). Las prácticas estándar de producción comercial incluyendo embolsado de racimos, lavado con agua a alta presión durante operaciones de postcosecha y otros tratamientos fitosanitarios eliminan cualquier posibilidad residual de presencia de esta especie foliar en frutos de Musa spp. (USDA-APHIS, 2013).</p> <p>Rimando, L.C. (1962). The Tetranychidae mites of the Philippines. University of the Philippines, College of Agriculture, Technical Bulletin 11: 1-52.</p> <p>Lo, P.K.C. & Ho, C.C. (1989). The Spider Mite Family Tetranychidae in Taiwan I. The Genus Oligonychus. Journal of the Taiwan Museum 42(2): 59-76.</p> <p>USDA-APHIS. (2013). Pest Risk Assessment for Bananas from the Philippines to Guam, Hawaii, and the Northern Mariana Islands. Version 3. <i>Category : SUBSTANTIVE</i></p>
131	45	Oligonychus orthius Rimando, 1962	C	<p>Chile</p> <p>Se asocia a hojas (DAFF, 2024) <i>Category : TECHNICAL</i></p>
132	48	Oligonychus velascoi Rimando, 1962	P	<p>Colombia</p>

				<p>Oligonychus velascoi Rimando, 1962 is a strictly foliar species documented in various host plants in Asian regions such as the Philippines and Thailand (Rimando, 1962; Bolland et al., 1998). Scientific evidence categorically establishes that O. velascoi is located exclusively in leaf tissue and there is no verifiable documentation of its presence in reproductive structures or commercial fruits, confirming that this species maintains a feeding behavior restricted to foliage in all hosts where it has been documented (Rimando, 1962; Bolland et al., 1998). Therefore, there is no scientific evidence to show that O. velascoi can follow the route of entry associated with the presentation of the product (hand and hand parts). Standard commercial production practices including cluster bagging, high-pressure water washing during post-harvest operations, and other phytosanitary treatments eliminate any residual possibility of the presence of this leaf species in Musa spp. fruits (USDA-APHIS, 2013).</p> <p>Bolland, H.R., Gutierrez, J. & Flechtmann, C.H.W. (1998). World Catalogue of the Spider Mite Family (Acari: Tetranychidae). Brill, Leiden. Rimando, L.C. (1962). The Tetranychidae mites of the Philippines. University of the Philippines, College of Agriculture, Technical Bulletin 11: 1-52.</p> <p>USDA-APHIS. (2013). Pest Risk Assessment for Bananas from the Philippines to Guam, Hawaii, and the Northern Mariana Islands. Version 3.</p> <p><i>Category : SUBSTANTIVE</i></p>
133	48	Oligonychus velascoi Rimando, 1962	P	<p>COSAVE</p> <p>This pest should be deleted because it is associated to leaves and not to fruit (EPPO, 2010; EPPO, 2008)</p> <p><i>Category : TECHNICAL</i></p>
134	48	Oligonychus velascoi Rimando, 1962	P	<p>Colombia</p> <p>Oligonychus velascoi Rimando, 1962 es una especie estrictamente foliar documentada en diversas plantas hospedantes en regiones asiáticas como Filipinas y Tailandia (Rimando, 1962; Bolland et al., 1998). La evidencia científica establece categóricamente que O. velascoi se localiza exclusivamente en tejido foliar y no existe documentación verificable de su presencia en estructuras reproductivas o frutos comerciales, confirmando que esta especie mantiene un comportamiento alimentario restringido al follaje en todos los hospedantes donde ha sido documentada (Rimando, 1962; Bolland et al., 1998). Por tanto, no existe evidencia científica que demuestre que O. velascoi pueda seguir la vía de ingreso asociada a la presentación del producto (mano y partes de mano). Las prácticas estándar de producción comercial incluyendo embolsado de racimos, lavado con agua a alta presión durante operaciones de postcosecha y otros tratamientos fitosanitarios eliminan cualquier posibilidad residual de presencia</p>

				de esta especie foliar en frutos de Musa spp. (USDA-APHIS, 2013). Bolland, H.R., Gutierrez, J. & Flechtmann, C.H.W. (1998). World Catalogue of the Spider Mite Family (Acari: Tetranychidae). Brill, Leiden. Rimando, L.C. (1962). The Tetranychidae mites of the Philippines. University of the Philippines, College of Agriculture, Technical Bulletin 11: 1-52. USDA-APHIS. (2013). Pest Risk Assessment for Bananas from the Philippines to Guam, Hawaii, and the Northern Mariana Islands. Version 3. <i>Category : SUBSTANTIVE</i>
135	48	<i>Oligonychus velascoi</i> Rimando, 1962	C	Chile Se asocia a hojas (DAFF, 2024) <i>Category : TECHNICAL</i>
136	51	<i>Tetranychus piercei</i> McGregor, 1950	C	Caribbean Agricultural Health and Food Safety Agency Tetranychus piercei should be italicized <i>Category : EDITORIAL</i>
137	51	Tetranychus piercei McGregor, 1950	P	Colombia Regarding Tetranychus piercei McGregor, 1950 does not follow the path in the presentation of the product (hands and parts of hands), taking into account that nymphs and adults are in the leaves and stems (APHIS, 2013; Liu and Liu, 1986) <i>Category : SUBSTANTIVE</i>
138	51	<i>Tetranychus piercei</i> McGregor, 1950	C	EPPO Should be in italics, there are several examples of this. The stewards should undertake a consistency check to ensure italics are used when appropriate. <i>Category : EDITORIAL</i>
139	51	Tetranychus piercei McGregor, 1950	P	COSAVE This pest should be deleted because it is associated to leaves and not to fruit (EPPO, 2010; EPPO, 2008) <i>Category : TECHNICAL</i>
140	51	Tetranychus piercei McGregor, 1950	P	Colombia Sobre Tetranychus piercei McGregor, 1950 no sigue la vía en la presentación del producto (manos y partes de manos), teniendo en cuenta que ninfas y adultos están en las hojas y tallos (APHIS, 2013; Liu and Liu, 1986) <i>Category : SUBSTANTIVE</i>
141	51	Tetranychus piercei McGregor, 1950	C	Chile Se asocia a hojas, no frutos (CABI, 2025) <i>Category : TECHNICAL</i>
142	52	Arthropoda: Insecta	P	New Zealand Remove Arthropoda as this style does not align with other headings in this table. <i>Category : EDITORIAL</i>
143	55	Fruit flies (Diptera)	C	Caribbean Agricultural Health and Food Safety Agency Other than Bactrocera musae, the other species are not

				considered pests of banana. In the case of <i>Caratitis capitata</i> , widely present in major banana producing areas of Latin America, there has never been a report of the pest in the consignment. All these species should be removed. <i>Category : TECHNICAL</i>
144	55	Fruit flies (Diptera)	P	<p>Colombia</p> <p>For species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 <i>Category : SUBSTANTIVE</i></p>
145	55	Moscas de la fruta (Diptera)	P	<p>Colombia</p> <p>Para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de</p>

				<p>Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 <i>Category : SUBSTANTIVE</i></p>
146	55	Moscas de la fruta (Diptera)	C	<p>Honduras</p> <p>para este producto en particular de Musa spp, Moscas de la fruta no representa ningún tipo de riesgo, sugiero se revise ampliamente este tema. <i>Category : EDITORIAL</i></p>
147	56	Tephritidae	P	<p>Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo “Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory” el cual indica que “En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales</p>

			<p>determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i></p>
148	57	<i>Bactrocera bryoniae</i> (Tryon, 1927)	<p>P Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i></p>
149	57	<i>Bactrocera bryoniae</i> (Tryon, 1927)	<p>P Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad</p>

			<p>Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i></p>
150	60	<i>Bactrocera carambolae</i> Drew & Hancock, 1994 <u>Suggest deleting <i>Bactrocera carambolae</i> Drew & Hancock, 1994, <i>Bactrocera caryeae</i> (Kapoor, 1971), <i>Bactrocera cucumis</i> (French, 1907)</u>	<p>P China Suggest deleting <i>Bactrocera carambolae</i> Drew & Hancock, 1994, <i>Bactrocera caryeae</i> (Kapoor, 1971), <i>Bactrocera cucumis</i> (French, 1907).</p> <p>Reason:After searching databases such as EPPO,CABI and references to the attachments of this standard, the host of <i>Bactrocera carambolae</i> Drew & Hancock, 1994, <i>Bactrocera caryeae</i> (Kapoor, 1971), <i>Bactrocera cucumis</i> (French, 1907) does not include bananas.According to ISPM46"Commodity-specific standards for phytosanitary measures"Article 2 List of pests associated with the commodity"This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on technical justification". At present, the above pests do not meet the conditions for inclusion in the list of pests. Category : <i>SUBSTANTIVE</i></p>
151	60	<i>Bactrocera carambolae</i> Drew & Hancock, 1994	<p>P Colombia For species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which</p>

			<p>indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 <i>Category : SUBSTANTIVE</i></p>
152	60	<i>Bactrocera carambolae</i> Drew & Hancock, 1994	<p>P Colombia</p> <p>Para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo</p>

				<p>impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : SUBSTANTIVE</p>
153	63	Bactrocera caryeae (Kapoor, 1971)	P	<p>Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : SUBSTANTIVE</p>
154	63	Bactrocera caryeae (Kapoor, 1971)	P	<p>Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de</p>

				<p>Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i></p>
155	66	<i>Bactrocera cucumis</i> (French, 1907)	P	<p>Colombia</p> <p>There are no technical studies on <i>Bactrocera cucumis</i> (French, 1907) that demonstrate its relationship with Musa as a host. The main hosts of <i>B. cucumis</i> are the Solanaceae and Cucurbitaceae plant families. Among the bibliographic references used by the ISPM 46 proposal is that of Dominiak et al., 2011, in which bananas are mentioned as a source of artificial diet in the laboratory for the breeding of this species but not as a natural host of <i>B. cucumis</i>.</p> <p>Category : <i>SUBSTANTIVE</i></p>
156	66	<i>Bactrocera cucumis</i> (French, 1907)	P	<p>Colombia</p> <p>Para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los</p>

				<p>bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : SUBSTANTIVE</p>
157	66	<i>Bactrocera cucumis</i> (French, 1907)	P	<p>Colombia</p> <p>Sobre <i>Bactrocera cucumis</i> (French, 1907) no se encuentran estudios técnicos que demuestren su relación con Musa como hospedante. Los principales hospedantes de <i>B. cucumis</i> son las familias vegetales de Solanaceae y Cucurbitaceae. Dentro de las referencias bibliográficas usadas por la propuesta de la NIMF 46 es la de Dominiak et al., 2011 en la que se menciona al banano como una fuente de dieta artificial en el laboratorio para la cría de esta especie mas no como un hospedante natural de <i>B. cucumis</i>. Category : SUBSTANTIVE</p>
158	69	<i>Bactrocera dorsalis</i> (Hendel, 1912)	P	<p>Colombia</p> <p>For species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free</p>

			<p>areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i></p>
159	69	<i>Bactrocera dorsalis</i> (Hendel, 1912)	<p>P Colombia</p> <p>Para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i></p>
160	72	<i>Bactrocera facialis</i> (Coquillett, 1909)	<p>P Colombia</p> <p>For species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for</p>

			<p>the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i></p>
161	72	<i>Bactrocera facialis</i> (Coquillett, 1909)	<p>P Colombia</p> <p>Para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo</p>

			<p>impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : SUBSTANTIVE</p>
162	75	Bactrocera frauenfeldi (Schiner, 1868)	<p>P Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : SUBSTANTIVE</p>
163	75	Bactrocera frauenfeldi (Schiner, 1868)	<p>P Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la</p>

				<p>Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 <i>Category : SUBSTANTIVE</i></p>
164	78	<i>Bactrocera jarvisi</i> (Tryon, 1927)	P	<p>Colombia</p> <p>For species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least</p>

			<p>restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i></p>
165	78	<i>Bactrocera jarvisi</i> (Tryon, 1927)	<p>P Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i></p>
166	81	<i>Bactrocera kandiensis</i> Drew & Hancock, 1994	<p>P Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on</p>

			<p>whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 <i>Category : SUBSTANTIVE</i></p>
167	81	<i>Bactrocera kandiensis</i> Drew & Hancock, 1994	<p>P Colombia</p> <p>Para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección</p>

			fitosanitaria. Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i>
168	84	Bactrocera kirki (Froggatt, 1911)	P Colombia For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU." However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen. Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i>
169	84	Bactrocera kirki (Froggatt, 1911)	P Colombia Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para

			<p>la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de <i>Musa</i> son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of <i>Musa</i> fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 <i>Category : SUBSTANTIVE</i></p>
170	87	<i>Bactrocera kraussi</i> (Hardy, 1951)	<p>P Colombia</p> <p>For species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of <i>Musa</i> fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of <i>Musa</i> fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which <i>Musa</i> fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p>

			Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i>
171	87	<i>Bactrocera kraussi</i> (Hardy, 1951)	P Colombia Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno". No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria. Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i>
172	90	<i>Bactrocera musae</i> (Tryon, 1927)	P Colombia For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits

			<p>are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : SUBSTANTIVE</p>
173	90	<i>Bactrocera musae</i> (Tryon, 1927)	<p>P Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021</p>

				Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 <i>Category : SUBSTANTIVE</i>
174	93	<i>Bactrocera neohumeralis</i> (Hardy, 1951)	P	<p>Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 <i>Category : SUBSTANTIVE</i></p>
175	93	<i>Bactrocera neohumeralis</i> (Hardy, 1951)	P	<p>Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía.</p>

				<p>Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : SUBSTANTIVE</p>
176	96	Bactrocera occipitalis (Bezzi, 1949)	P	<p>Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal</p>

				2021; 19(3):6426 <i>Category : SUBSTANTIVE</i>
177	96	<i>Bactrocera occipitalis</i> (Bezzi, 1919)	P	<p>Colombia</p> <p>Para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 <i>Category : SUBSTANTIVE</i></p>
178	99	<i>Bactrocera pyrifoliae</i> Drew & Hancock, 1994	P	<p>China</p> <p>After searching databases such as EPPO, CABI and references to the attachments of this standard, the host of <i>Bactrocera pyrifoliae</i> Drew & Hancock, 1994 don't include bananas. According to ISPM46 "Commodity-specific standards for phytosanitary measures" Article 2 List of pests associated with the commodity "This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on technical justification". At present, the above pest do not meet the conditions for inclusion in the list of pests. <i>Category : SUBSTANTIVE</i></p>

179	99	<i>Bactrocera pyrifoliae</i> Drew & Hancock, 1994	P	<p>Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : SUBSTANTIVE</p>
180	99	<i>Bactrocera pyrifoliae</i> Drew & Hancock, 1994	P	<p>Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p>

				<p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i></p>
181	102	<i>Bactrocera tryoni</i> (Froggatt, 1897)	P	<p>Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i></p>
182	102	<i>Bactrocera tryoni</i> (Froggatt, 1897)	P	<p>Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la</p>

				<p>evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : SUBSTANTIVE</p>
183	105	<i>Ceratitis capitata</i> (Wiedemann, 1824)	P	<p>Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA</p>

			<p>(2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i></p>
184	105	Ceratitis capitata (Wiedemann, 1824)	<p>P Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 Category : <i>SUBSTANTIVE</i></p>
185	105	Ceratitis capitata (Wiedemann, 1824)	<p>C Chile</p> <p>No hay evidencia de asociación Category : <i>TECHNICAL</i></p>

186	108	<i>Ceratitis cosyra</i> (Walker, 1849)	P	<p>Colombia</p> <p>For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : SUBSTANTIVE</p>
187	108	<i>Ceratitis cosyra</i> (Walker, 1849)	P	<p>Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p>

				<p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 <i>Category : SUBSTANTIVE</i></p>
188	108	<i>Ceratitis cosyra</i> (Walker, 1849)	C	<p>Chile No hay evidencia de asociación <i>Category : TECHNICAL</i></p>
189	111	<i>Zeugodacus tau</i> (Walker, 1849)	P	<p>China After searching databases such as EPPO,CABI and references to the attachments of this standard, the host of Zeugodacus tau (Walker, 1849) don't include bananas,harm to fruits of Cucurbitaceae plants.According to ISPM46"Commodity-specific standards for phytosanitary measures"Article 2 List of pests associated with the commodity"This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on technical justification". At present, the above pest do not meet the conditions for inclusion in the list of pests. <i>Category : SUBSTANTIVE</i></p>
190	111	<i>Zeugodacus tau</i> (Walker, 1849)	P	<p>Colombia At the level of the search for Musa spp. as a host of Zeugodacus tau, there are lists of species that were associated with its previous classification as Bactrocera tau, specifically in regulations issued by some countries such as the United States. However, these lists do not have primary sources, nor is it identified in which part of the world the alleged impact occurred. According to Zlotina (2015) in his article entitled "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" the way in which information is handled (cited, analyzed, discussed) can have serious and long-lasting consequences for NPPOs. Information about pests, including their condition in an area or in a host, can be cited in one source, and then this source is cited again in others without having been validated or verified. This results in "circular references" in which the original source of information may be lost, but the record is perpetuated in secondary sources, which often cite themselves.</p>

				<p>"Circular" information regarding historical records of the presence or absence of pests, or the status of plants as pest hosts, may not be accurate from the outset or outdated. When these records are repeatedly cited in the scientific literature, they become part of the scientific literature and are extremely difficult to correct.</p> <p>On the other hand, Liu and Jin, 2024, in their article Review of <i>Zeugodacus tau</i> (Walker) (Diptera: Tephritidae): biological characteristics and control strategy does not register <i>Musa</i> sp. as a host of this fly.</p> <p>Category : <i>SUBSTANTIVE</i></p>
191	111	<i>Zeugodacus tau</i> (Walker, 1849)	P	<p>Colombia</p> <p>For species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of <i>Musa</i> fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of <i>Musa</i> fruits (bananas and plantains) could constitute a potential pathway for the introduction of <i>B. dorsalis</i> and other non-EU tephritids, of which <i>Musa</i> fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of <i>Musa</i> fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426</p> <p>Category : <i>SUBSTANTIVE</i></p>
192	111	<i>Zeugodacus tau</i> (Walker, 1849)	P	<p>Colombia</p> <p>A nivel de la búsqueda de <i>Musa</i> spp. como hospedante de <i>Zeugodacus tau</i>, se encuentran listados de especies que estaban asociados a su anterior clasificación como <i>Bactrocera tau</i>, específicamente en regulaciones emitidas por algunos países como Estados Unidos. No obstante, esos listados no cuentan con fuentes primarias, ni se identifica en que parte del mundo se dio la</p>

			<p>supuesta afectación. De acuerdo con Zlotina (2015) en su artículo titulado "Evaluation of evidence and its uncertainty in qualitative pest risk assessments: the North American perspective" la forma en que se maneja la información (citada, analizada, discutida) puede tener consecuencias graves y duraderas para las ONPF. La información sobre plagas, incluyendo su condición en un área o en un hospedante, puede citarse en una fuente, y luego esta fuente se vuelve a citar en otras sin haber sido validada o verificada. Esto da lugar a «referencias circulares» en las que la fuente original de información puede perderse, pero el registro se perpetúa en fuentes secundarias, que a menudo se citan a sí mismas. La información «circular» relativa a los registros históricos de presencia o ausencia de plagas, o a la situación de las plantas como hospedantes de plagas, puede no ser precisa desde el principio o estar desactualizada. Cuando estos registros se citan repetidamente en la literatura científica, pasan a formar parte de la misma y resulta extremadamente difícil corregirlos.</p> <p>De otro lado Liu y Jin, 2024, en su artículo Review of Zeugodacus tau (Walker) (Diptera: Tephritidae): biological characteristics and control strategy no registra a Musa sp. como hospedante de esta mosca.</p> <p>Category : <i>SUBSTANTIVE</i></p>
193	111	<i>Zeugodacus tau (Walker, 1849)</i>	<p>P Colombia</p> <p>Para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección</p>

				fitosanitaria. Referencia: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021;19(3):6426 <i>Category : SUBSTANTIVE</i>
194	111	Zeugodacus tau (Walker, 1849)	C	Chile Es sinonimia de Bactrocera tau. Este último es el nombre más usado (CABI, 2025; GBIF.org, 2025) <i>Category : TECHNICAL</i>
195	114	Pentalonia nigronervosa Coquerel, 1859	C	Chile Se asocia a hojas, tallos (CABI, 2025; Cubillos, 2013) <i>Category : TECHNICAL</i>
196	115	Mealybugs and scales (Hemiptera)	C	United States of America Add Family: Coccidae and 2 species: Ceroplastes rubens (Maskell, 1839) and Coccus viridis (Green, 1889) Brazil Do you mean that the USA regulates these Coccidae in fruit trade? Do you consider that Musa fruit is a pathway for these pests? <i>Category : TECHNICAL</i>
197	115	Mealybugs and scales (Hemiptera) scale insect	P	China <i>Category : TECHNICAL</i>
198	116	Diaspididae	P	Costa Rica The pest list includes Diaspididae, which are pests of low mobility and therefore has a low probability to be transferred to a suitable host, considering the intended use. <i>Category : SUBSTANTIVE</i>
199	116	Diaspididae	P	Colombia For species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which indicates that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential pathway for the introduction of B. dorsalis and other non-EU tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it is not a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."

				<p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>Reference: EFSA (European Food Safety Authority), 2021 Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory. EFSA Journal 2021; 19(3):6426 Category : <i>SUBSTANTIVE</i></p>
200	116	Diaspididae	P	<p>COSAVE Diaspididae scale insects should be removed from the table 1, as they pose a low probability of transfer to a suitable host according to COSAVE Standard 3.15, and therefore should not be regulated on fresh banana fruit. Category : <i>TECHNICAL</i></p>
201	116	Diaspididae	C	<p>Brazil The pest list includes Diaspididae, which are pests of low mobility and therefore has a low probability to be transferred to a suitable host, considering the intended use. Alternatively, the list comprises pests associated with fruits or pests along with risk mitigation measures consider the intended use. In this context, given that Diaspididae should not be considered. COSAVE has a Regional Stantard for PRA of pests with low probability of transfer to a suitable host (ERPF 3.5) Category : <i>TECHNICAL</i></p>
202	117	Aspidiotus coryphae Cockerell & Robinson, 1915	P	<p>COSAVE See COSAVE comment to paragraph 116 Category : <i>TECHNICAL</i></p>
203	117	Aspidiotus coryphae Cockerell & Robinson, 1915	C	<p>Chile Se asocia a hojas, tallos (Sugimoto, 1994) Category : <i>TECHNICAL</i></p>
204	120	Aspidiotus destructor Signoret, 1869	P	<p>COSAVE See COSAVE comment to paragraph 116 Category : <i>TECHNICAL</i></p>
205	120	Aspidiotus destructor Signoret, 1869	C	<p>Chile Se asocia a hojas, tallos (CABI, 2025; García Morales et al., 2016) Category : <i>TECHNICAL</i></p>
206	123	Aspidiotus excisus Green, 1896	P	<p>COSAVE See COSAVE comment to paragraph 116 Category : <i>TECHNICAL</i></p>
207	126	Hemiberlesia cyanophylli (Signoret, 1869)	P	<p>COSAVE See COSAVE comment to paragraph 116</p>

				Category : TECHNICAL
208	129	Hemiberlesia lataniae (Signoret, 1869)	P	COSAVE See COSAVE comment to paragraph 116 Category : TECHNICAL
209	132	Hemiberlesia palmarum (Cockerell, 1893)	P	COSAVE See COSAVE comment to paragraph 116 Category : TECHNICAL
210	135	Pinnaspis musae Takagi, 1963	P	COSAVE See COSAVE comment to paragraph 116 Category : TECHNICAL
211	138	Selenaspis articulatus (Morgan, 1889)	P	COSAVE See COSAVE comment to paragraph 116 Category : TECHNICAL
212	140	Pseudococcidae	C	United States of America Add Species Maconellicoccus hirsutus (Green, 1908): reference: https://gd.eppo.int/taxon/PHENHI/categorization Add species: Paracoccus marginatus Williams & Granara de Willink, 1992; Pseudococcus cryptus (Hempel, 1918) Brazil Do you mean that the USA regulates these pests in fruit trade? Do you consider that Musa fruit is a pathway for these pests? Category : TECHNICAL
213	141	Dysmicoccus bispinosus texensis -Beardsley (Tinsley, 1965) (1900)	P	Japan D. bispinosus is now considered a synonym of D. texensis. Scalenet: https://scalenet.info/catalogue/Dysmicoccus%20bispinosus/ Category : TECHNICAL
214	175	Whiteflies (Hemiptera)	C	EPPO It is the same order as group above – an editorial change could be merging the two lines. Category : EDITORIAL
215	175	Whiteflies (Hemiptera)	P	COSAVE Musa spp. fruit moving in international trade undergoes a post-harvest process that includes immersion in chlorinated water. This eliminates the risk of certain insects, such as whiteflies. Furthermore they are associated with leaves. Category : TECHNICAL
216	176	Aleyrodidae pests are considered contaminant pests.	P	Costa Rica Category : SUBSTANTIVE
217	176	Aleyrodidae	P	COSAVE See COSAVE comment to paragraph 175 Category : TECHNICAL
218	176	Aleyrodidae	P	OIRSA La fruta de banano comercializado internacionalmente o de exportación pasan por un proceso postcosecha que incluye

				inmersión en agua con cloro. Se reduce al mínimo el riesgo de ciertos insectos como las moscas blancas, que además están asociados a hojas. <i>Category : SUBSTANTIVE</i>
219	177	Aleurocanthus woglumi Ashby, 1915	P	COSAVE See COSAVE comment to paragraph 175 <i>Category : TECHNICAL</i>
220	180	Aleurodicus dispersus Russell, 1965	P	COSAVE See COSAVE comment to paragraph 175 <i>Category : TECHNICAL</i>
221	180	Aleurodicus dispersus Russell, 1965	C	Chile Asociada a hojas (CABI, 2025; Evans, 2007) <i>Category : TECHNICAL</i>
222	183	Aleurodicus floccissimus (Martin, Hernández Suarez & Carnero, 1997)	P	Colombia Aleurodicus floccissimus, does not affect fresh fruits of Musa spp. <i>Category : SUBSTANTIVE</i>
223	183	Aleurodicus floccissimus (Martin, Hernández Suarez & Carnero, 1997)	P	COSAVE See COSAVE comment to paragraph 175 <i>Category : TECHNICAL</i>
224	183	Aleurodicus floccissimus (Martin, Hernández Suarez & Carnero, 1997)	P	Colombia Aleurodicus floccissimus, no afecta frutos frescos de Musa spp. <i>Category : SUBSTANTIVE</i>
225	184	Moths (Lepidoptera)	C	Costa Rica pests are considered contaminant pests. <i>Category : SUBSTANTIVE</i>
226	184	Moths (Lepidoptera)	C	United States of America Add new pest group Beetles (Coleoptera), Family Curculionidae, species Cosmopolites sordidus (Germar, 1824) Brazil Do you mean that the USA regulates Cosmopolites sordidus in fruit trade? Do you consider that Musa fruit is a pathway for this pest? Could you provide any evidence of this? <i>Category : TECHNICAL</i>
227	184	Moths (Lepidoptera)	C	United States of America Add new family Hesperidae, species Erionota thrax (Linnaeus, 1767) Brazil Do you mean that the USA regulates Erionota thrax in Musa fruit trade? Do you consider that Musa fruit is a pathway for this pest? <i>Category : TECHNICAL</i>
228	188	Noctuidae	C	United States of America Add new species: Spodoptera eridania (Stoll, 1782); Spodoptera frugiperda (Smith, 1797) Per eppo database https://gd.eppo.int/taxon/MUBSS/pests

				Brazil Do you mean that the USA regulates these Lepidoptera in fruit trade? Do you consider that Musa fruit is a pathway for these pests? <i>Category : TECHNICAL</i>
229	188	Noctuidae	P	COSAVE The scope of ISPM 46 does not cover contaminating pests. Furthermore, according to the SC report, there is no PRA available to justify their inclusion in the Table. <i>Category : TECHNICAL</i>
230	189	Spodoptera eridania (Stoll, 1782)	P	Colombia Spodoptera eridania, there are no scientific reports that indicate that this species affects Musa spp. <i>Category : SUBSTANTIVE</i>
231	189	Spodoptera eridania (Stoll, 1782)	P	COSAVE The scope of ISPM 46 does not cover contaminating pests. <i>Category : TECHNICAL</i>
232	189	Spodoptera eridania (Stoll, 1782)	P	Colombia Spodoptera eridania, no existen reportes científicos que indiquen que esta especie afecta a Musa spp. <i>Category : SUBSTANTIVE</i>
233	192	Spodoptera frugiperda (Smith, 1797)	P	Colombia In relation to Spodoptera frugiperda, there are no scientific reports that indicate that this species affects the fruit of Musa spp. <i>Category : SUBSTANTIVE</i>
234	192	Spodoptera frugiperda (Smith, 1797)	C	EPPO It does not appear to be any scientific evidence that Musa fruit can be a pathway for Spodoptera frugiperda <i>Category : SUBSTANTIVE</i>
235	192	Spodoptera frugiperda (Smith, 1797)	P	COSAVE See COSAVE comment in paragraph 188 <i>Category : TECHNICAL</i>
236	192	Spodoptera frugiperda (Smith, 1797)	P	Colombia Con relación a Spodoptera frugiperda, no existen reportes científicos que indiquen que esta especie afecte el fruto de Musa spp. <i>Category : SUBSTANTIVE</i>
237	198	Oiketicus kirbyi Guilding, 1827	P	Colombia A review of technical and scientific information was carried out and no reliable sources were found to validate that this insect affects fresh fruit of Musa spp. Therefore, it does not follow the route of entry and must be eliminated. <i>Category : SUBSTANTIVE</i>
238	198	Oiketicus kirbyi Guilding, 1827	P	Colombia Se realizó revisión de información técnica y científica y no se encontraron fuentes confiables que valide que este insecto afecta fruta fresca de Musa spp. Por lo anterior, no sigue la vía de ingreso y debe eliminarse.

				<i>Category : SUBSTANTIVE</i>
239	198	Oiketicus kirbyi Guilding, 1827	C	Chile Asociada a hojas (Bustillo, 2024) <i>Category : TECHNICAL</i>
240	222	Thrips palmi Karny, 1925	P	Colombia A review of technical and scientific information was carried out and no reliable sources were found to validate that this insect affects fresh fruit of Musa spp. <i>Category : SUBSTANTIVE</i>
241	222	Thrips palmi Karny, 1925	P	Colombia Se realizó revisión de información técnica y científica y no se encontraron fuentes confiables que valide que este insecto afecta fruta fresca de Musa spp. <i>Category : SUBSTANTIVE</i>
242	223	Mollusca	P	Costa Rica pests are considered contaminant pests. <i>Category : SUBSTANTIVE</i>
243	223	Mollusca Delete Mollusca, include: <u>Lissachatina fulica (Bowdich, 1822) and Succinea spp. Draparnaud, 1801.</u>	P	China Snails usually lay eggs in soil or haystacks. With relatively large body size, snails are considered as contaminants. It is recommended to clarify in the text that snails are not within the scope of pests specified in this standard. <i>Category : SUBSTANTIVE</i>
244	223	Mollusca	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
245	226	Snails (Gastropoda)	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
246	227	Achatinidae	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
247	228	Lissachatina fulica (Bowdich, 1822)	P	Japan Refer to general comments. A contaminating pest is not a target pest under ISPM 46; therefore, the snail species should be removed from the pest list in Table 1 and the phytosanitary measures in Table 3. Snail species are polyphagous, and Lissachatina fulica has been reported to feed on over 500 plant species. It may become problematic as a pest, causing damage to plant bodies and fruits in banana plantations; however, for fresh banana fruits for consumption moving internationally, it can be considered a contaminating pest rather than the host-pest relationship. <i>Category : SUBSTANTIVE</i>
248	230	Succineidae	P	Japan Refer to general comments and comments for paragraph No 228.

				<i>Category : SUBSTANTIVE</i>
249	231	Succinea spp. Draparnaud, 1801	P	Colombia A review of technical and scientific information was carried out and no reliable sources were found to validate that this insect affects fresh fruit of Musa spp. <i>Category : SUBSTANTIVE</i>
250	231	Succinea spp. Draparnaud, 1801	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
251	231	Succinea spp. Draparnaud, 1801	P	Colombia Se realizó revisión de información técnica y científica y no se encontraron fuentes confiables que valide que este insecto afecta fruta fresca de Musa spp <i>Category : SUBSTANTIVE</i>
252	235	Fungien taxonomie, Fungi représente le règne des différents champignons. Depuis le haut, dans ce tableau, on donne la dénomination du groupe, du nom vernaculaire de l'organisme nuisible, suivi de l'ordre dudit organisme, mis en parenthèse. Pourquoi cela ne s'applique pas au groupe des champignons, pourquoi ne définit-on pas leur ordre? En guise d'exemple, Colletotrichum musae, appartient à l'ordre des Glomerallales	P	IPPC Regional Workshop Africa <i>Category : TECHNICAL</i>
253	237	Ceratocystis paradoxa (Dade) C. Moreau, 1952	P	Colombia Ceratocystis paradoxa is mainly associated with crown rot in post-harvest of ripe fruits, not in freshly harvested immature fruits such as those used in the marketing of the fruit. Therefore, in vigorous plants selected for cutting and harvested in an immature state, the bunches do not harbor inoculum or visible symptoms, which rules out that they follow the route of entry into international shipments (Reyes et al., 1998). Reyes, M. E. Q., Nishijima, W., & Paull, R. E. (1998). Control of crown rot in 'Santa Catarina Prata' and 'Williams' banana with hot water treatments. Postharvest Biology and Technology, 14(1), 71–75. <i>Category : SUBSTANTIVE</i>
254	237	Ceratocystis paradoxa (Dade) C. Moreau, 1952	P	Colombia Ceratocystis paradoxa está asociado principalmente a la pudrición de corona en poscosecha de frutos maduros, no en frutos inmaduros recién cosechados como los empleados en la comercialización del fruto. Por lo tanto, en plantas vigorosas seleccionadas para corte y cosechadas en estado inmaduro, los racimos no albergan inoculo ni síntomas visibles, lo que descarta que siga la vía de ingreso en envíos internacionales (Reyes et al., 1998). Reyes, M. E. Q., Nishijima, W., & Paull, R. E. (1998). Control of crown rot in 'Santa Catarina Prata' and 'Williams' banana with hot water treatments. Postharvest Biology and Technology, 14(1), 71–75. <i>Category : SUBSTANTIVE</i>

255	240	Colletotrichum musae (Berk. & M.A. Curtis) Arx, 1957	P	<p>Colombia Brown et al, (1980), demonstrated that immature fruits have fungitoxic phytoalexins that confer natural resistance to Colletotrichum musae, remaining free of symptoms at the time of cutting. Thus, the selected green bunches do not contain active infection and do not represent a phytosanitary risk. This does not make it unfeasible for it to follow the entry route.</p> <p>Brown, A. E., & Swinburne, T. R. (1980). The resistance of immature banana fruits to anthracnose (Colletotrichum musae (Berk. & Curt.) Arx.) <i>Category : SUBSTANTIVE</i></p>
256	240	Colletotrichum musae (Berk. & M.A. Curtis) Arx, 1957	P	<p>Colombia Brown et al, (1980), demostraron que frutos inmaduros poseen fitoalexinas fungitoxicas que les confieren resistencia natural a Colletotrichum musae, manteniéndose libres de síntomas al momento del corte. Así, los racimos verdes seleccionados no contienen infección activa ni representan riesgo fitosanitario. Lo no hace inviable que siga la vía de ingreso.</p> <p>Brown, A. E., & Swinburne, T. R. (1980). The resistance of immature banana fruits to anthracnose (Colletotrichum musae (Berk. & Curt.) Arx.) <i>Category : SUBSTANTIVE</i></p>
257	242	Mycosphaerellaceae	C	<p>Caribbean Agricultural Health and Food Safety Agency Experience in extensive trade indicates that the pests in this category do not follow the pathway. Should be removed. <i>Category : TECHNICAL</i></p>
258	242	Mycosphaerellaceae	P	<p>COSAVE Deleted because these pathogens are associated with leaves <i>Category : TECHNICAL</i></p>
259	243	Mycosphaerella musicola R. Leach, 1941	P	<p>Colombia Mycosphaerella musicola, the causal agent of yellow sigatoka, is a strictly foliar fungus that develops its life cycle in the tissue of banana leaves, generating lesions that reduce photosynthesis and affect the vigor of the plant, but does not colonize or produce symptoms in immature fruits. Several studies confirm that their reproductive structures (ascospores and conidia) are generated and dispersed only from the diseased leaf tissue and not from the surface of the fruit (Stover, 1970; Gomes et al., 2013).</p> <p>In addition, the fruit destined for export is harvested in a green state and comes from vigorous plants that are rigorously selected, minimizing the presence of adhered or contaminated leaf tissue in the packaging. The disease is not transmitted by the trade in fresh bunches, since the infective phase of the fungus is not found in the fruit and requires live leaves to complete its cycle. Therefore,</p>

				<p>the risk of introduction and dissemination of <i>M. musicola</i> through the export of fresh fruit is zero or negligible.</p> <p>Gomes, L. I. S., Pereira, A. A., Gasparotto, L., & Cordeiro, Z. J. M. (2013). <i>Mycosphaerella musicola</i> identified as the only pathogen of the Sigatoka disease complex present in Minas Gerais State, Brazil. <i>Plant Disease</i>, 97(12), 1537-1543.</p> <p>Stover, R. H. (1970). Leaf spot of bananas caused by <i>Mycosphaerella musicola</i>. <i>Phytopathology</i>, 60(5), 856-862.</p> <p><i>Category : SUBSTANTIVE</i></p>
260	243	<i>Mycosphaerella musicola</i> R. Leach, 1941	P	<p>Japan</p> <p>Refer to general comments.</p> <p><i>Mycosphaerella musicola</i> shows symptoms on leaves and is considered an important pest in banana plantations. However, there is no information causing direct symptoms (infectious lesions and the source of infection to other plants) on the fruits. As there is not source of infection on the fruits, fresh banana fruits for consumption moved internationally cannot become a pathway for entry into other countries. The countries regulating fresh bananas (the countries that proposed adding this fungus to this annex) may be regulating this fungus species because its spores are likely to attach to banana fruits. But this type of pest is a contaminating pest.</p> <p><i>Category : SUBSTANTIVE</i></p>
261	243	<i>Mycosphaerella musicola</i> R. Leach, 1941	P	<p>COSAVE</p> <p>See COSAVE comment in paragraph 242</p> <p><i>Category : TECHNICAL</i></p>
262	243	<i>Mycosphaerella musicola</i> R. Leach, 1941	P	<p>Colombia</p> <p><i>Mycosphaerella musicola</i>, agente causal de la sigatoka amarilla, es un hongo estrictamente foliar que desarrolla su ciclo de vida en el tejido de las hojas de banano, generando lesiones que reducen la fotosíntesis y afectan el vigor de la planta, pero no coloniza ni produce síntomas en los frutos inmaduros. Diversos estudios confirman que sus estructuras reproductivas (ascosporas y conidios) se generan y dispersan únicamente desde el tejido foliar enfermo y no desde la superficie del fruto (Stover, 1970; Gomes et al., 2013).</p> <p>Además, la fruta destinada a exportación se cosecha en estado verde y proviene de plantas vigorosas que son rigurosamente seleccionadas, reduciendo al mínimo la presencia de tejido foliar adherido o contaminado en el empaque. La enfermedad no se transmite por el comercio de racimos frescos, dado que la fase infectiva del hongo no se encuentra en la fruta y requiere hojas vivas para completar su ciclo. Por lo tanto, el riesgo de introducción y diseminación de <i>M. musicola</i> a través de la exportación de fruta fresca es nulo o insignificante.</p> <p>Gomes, L. I. S., Pereira, A. A., Gasparotto, L., & Cordeiro, Z. J. M.</p>

				(2013). <i>Mycosphaerella musicola</i> identified as the only pathogen of the Sigatoka disease complex present in Minas Gerais State, Brazil. Plant Disease, 97(12), 1537-1543. Stover, R. H. (1970). Leaf spot of bananas caused by <i>Mycosphaerella musicola</i> . Phytopathology, 60(5), 856-862. Category : <i>SUBSTANTIVE</i>
263	246	<i>Pseudocercospora fijiensis</i> (M. Morelet) Deighton, 1976	P	Colombia Pseudocercospora fijiensis affects only leaves, reducing photosynthesis and yield, but does not colonize immature fruits. Fullerton & Casonato (2019) experimentally demonstrated that the fungus does not infect and cannot complete its cycle in the epidermis of green-harvested Cavendish fruits. On the other hand, Isaza et al. (2016) emphasize that P. fijiensis and the rest of the Sigatoka complex exclusively infect leaf tissues, reducing photosynthesis and causing premature ripening of fruits in the field, but there is no evidence of colonization or transmission of the pathogen by exportable bunches harvested in an immature state. Fullerton, R. A., & Casonato, S. G. (2019). The infection of the fruit of 'Cavendish' banana by Pseudocercospora fijiensis, cause of black leaf streak (black Sigatoka). European Journal of Plant Pathology, 155(3), 779-787. Arango Isaza RE, Diaz-Trujillo C, Dhillon B, Aerts A, Carlier J, Crane CF, V de Jong T, de Vries I, Dietrich R, Farmer AD, Fortes Ferreira C, Garcia S, Guzman M, Hamelin RC, Lindquist EA, Mehrabi R, Quiros O, Schmutz J, Shapiro H, Reynolds E, Scalliet G, Souza M Jr, Stergiopoulos I, Van der Lee TA, De Wit PJ, Zapater MF, Zwiers LH, Grigoriev IV, Goodwin SB, Kema GH. Combating a Global Threat to a Clonal Crop: Banana Black Sigatoka Pathogen Pseudocercospora fijiensis (Synonym Mycosphaerella fijiensis) Genomes Reveal Clues for Disease Control. PLoS Genet. 2016 Aug 11; 12(8). Category : <i>SUBSTANTIVE</i>
264	246	<i>Pseudocercospora fijiensis</i> (M. Morelet) Deighton, 1976	P	COSAVE See COSAVE comment in paragraph 242 Category : <i>TECHNICAL</i>
265	246	<i>Pseudocercospora fijiensis</i> (M. Morelet) Deighton, 1976	P	Colombia Pseudocercospora fijiensis afecta únicamente hojas, reduciendo fotosíntesis y rendimiento, pero no coloniza los frutos inmaduros. Fullerton & Casonato (2019) demostraron experimentalmente que el hongo no infecta ni puede completar su ciclo en la epidermis de frutos Cavendish cosechados en verde. Por otro lado, Isaza et al. (2016) enfatizan que P. fijiensis y el resto del complejo de Sigatoka infectan exclusivamente tejidos foliares, reduciendo fotosíntesis y provocando maduración prematura de frutos en campo, pero no existe evidencia de colonización ni transmisión del

				<p>patógeno por los racimos exportables cosechados en estado inmaduro.</p> <p>Fullerton, R. A., & Casonato, S. G. (2019). The infection of the fruit of 'Cavendish' banana by <i>Pseudocercospora fijiensis</i>, cause of black leaf streak (black Sigatoka). <i>European Journal of Plant Pathology</i>, 155(3), 779-787.</p> <p>Arango Isaza RE, Diaz-Trujillo C, Dhillon B, Aerts A, Carlier J, Crane CF, V de Jong T, de Vries I, Dietrich R, Farmer AD, Fortes Ferreira C, Garcia S, Guzman M, Hamelin RC, Lindquist EA, Mehrabi R, Quiros O, Schmutz J, Shapiro H, Reynolds E, Scalliet G, Souza M Jr, Stergiopoulos I, Van der Lee TA, De Wit PJ, Zapater MF, Zwiers LH, Grigoriev IV, Goodwin SB, Kema GH. Combating a Global Threat to a Clonal Crop: Banana Black Sigatoka Pathogen <i>Pseudocercospora fijiensis</i> (Synonym <i>Mycosphaerella fijiensis</i>) Genomes Reveal Clues for Disease Control. <i>PLoS Genet.</i> 2016 Aug 11;12(8).</p> <p>Category : <i>SUBSTANTIVE</i></p>
266	248	Nectriaceae	C	<p>Caribbean Agricultural Health and Food Safety Agency</p> <p>Experience indicates that Foc TR4 will not follow the pathway. Should be removed.</p> <p>Category : <i>TECHNICAL</i></p>
267	248	Nectriaceae	P	<p>Japan</p> <p>Refer to general comments and comments for paragraph No 249.</p> <p>Category : <i>SUBSTANTIVE</i></p>
268	248	Nectriaceae	P	<p>COSAVE</p> <p>See COSAVE comment in paragraph 249</p> <p>Category : <i>TECHNICAL</i></p>
269	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	P	<p>Costa Rica</p> <p><i>Fusarium oxysporum</i> f.sp. <i>cubense</i> tropical race 4 (Foc TR4) is considered an important pest in banana plantations. However, there is no information causing symptoms on the fruits. Therefore, as there is not source of infection (sporangium) on the fruits, fresh banana fruits for consumption moved internationally cannot become a pathway for entry into other countries</p> <p>Category : <i>TECHNICAL</i></p>
270	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	C	<p>Canada</p> <p>According to an IPPC publication, <i>Fusarium</i> TR4 can enter into new areas through human-mediated and natural pathways, including movement of infected planting material, movement of contaminated soil on agricultural machinery, farm tools and footwear, drainage water, surface (rain or irrigation) water runoff, floods and unsterilized potting composts. Given that commodity standards are supposed to be limited in their scope to the described commodity (in this case the banana itself as a fruit), is there sufficient scientific evidence to include <i>Fusarium</i> TR4 in this draft Annex as a pest that could be spread via the <i>Musa</i> spp. fruit pathway? If not, it would seem that it should not be included in</p>

			the standard as it may work against the intended objective of facilitating safe trade. For the TPCS to consider. <i>Category : SUBSTANTIVE</i>
271	249	<i>Fusarium oxysporum f.sp. cubense (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4</i>	<p>P Colombia</p> <p>Regarding the inclusion of <i>Fusarium oxysporum f.sp. Tropical Race 4</i> (Foc TR4), in Table 1 and the mention that the appropriate mitigation measures for this pathogen are free areas or free production sites (Table 3), respectfully expresses concern about the erroneous message that is being spread. The above, taking into account that research carried out by the Plant Biosecurity Laboratory of the Australian Department of Agriculture, Fisheries and Forestry (DAFF), in which 451 tissue samples of Cavendish banana fruit from plants infected with Foc TR4 were analyzed, it was concluded that this pathogen does not infect the fruit (DAFF, 2018). Additional studies confirm that even in advanced stages of the disease, the fruit remains free of Foc TR4 infection (Daly & Walduck, 2006; Dita et al., 2010).</p> <p>The incorporation of this pest as associated with fresh fruit of <i>Musa spp.</i> for human consumption constitutes an unjustified measure that imposes disproportionate restrictions on international trade, with significant social and economic impacts for producing countries. This measure compromises the competitiveness of the sector, generates uncertainty in the markets and puts at risk thousands of direct and indirect jobs linked to this production chain.</p> <p>The report of the Standards Committee held from 12 to 16 May 2025, in Rome, Italy, states that "Some SC members expressed doubt about whether <i>Musa</i> fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of <i>Musa</i> to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending consultation comments". However, it is considered that disseminating this information worldwide without prior validation is an unwise practice, which generates confusion and misinformation, thus promoting unjustified measures by importing countries and the use of scarce resources to implement actions that are not required or, failing that, making exports unviable. While recognizing the sovereign right of countries to establish phytosanitary measures to protect plant health, this right should be exercised on the basis of scientific</p>

				<p>criteria and without creating unnecessary obstacles to international trade.</p> <p>Therefore, and in accordance with the principles established in ISPM No. 1, it is categorically requested not to disseminate information contrary to the existing scientific evidence, which demonstrates that Foc TR4 does not affect the fresh fruit of Musa spp., and requiring this type of phytosanitary measures for this pest constitutes a barrier to trade, lacking scientific justification and contrary to the principles of the IPPC.</p> <p>Daly, A & Walduck, G. 2006. Fusarium wilt of banana (Panama disease). Agnote. 151(5). Dita, M. A., Waalwijk, C., Buddenhagen, I. W., Souza Jr, M. T. & Kema, G. H. J. 2010. A molecular diagnostic for tropical race 4 of the banana fusarium wilt pathogen. Plant Pathology. 59 (2). 348-357. Category : <i>SUBSTANTIVE</i></p>
272	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	P	<p>Japan</p> <p>Refer to general comments.</p> <p><i>Fusarium oxysporum</i> f.sp. <i>cubense</i> tropical race 4 (Foc TR4) is considered an important pest in banana plantations. However, there is no information causing symptoms on the fruits. Therefore, as there is not source of infection (sporangium) on the fruits, fresh banana fruits for consumption moved internationally cannot become a pathway for entry into other countries. The countries regulating fresh bananas (the countries that proposed adding this fungus to this annex) may be regulating this fungus species because its spores are likely to attach to banana fruits. But this type of pest is a contaminating pest. Category : <i>SUBSTANTIVE</i></p>
273	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	C	<p>India</p> <p>India agrees with COSAVE for deletion of <i>Fusarium oxysporum</i> f.sp. <i>cubense</i> as this is not associated with pathway. Category : <i>TECHNICAL</i></p>
274	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	C	<p>Philippines</p> <p>Based on scientific evidence, Musa spp. fruit is not a pathway for Foc TR4 and has no reports of infection in the fruit itself; thus, we strongly recommend its removal from the pest list. Although Bai et al. (2020) observed Foc TR4 invasion of peduncles through the xylem vascular bundle, the scope of this ISPM covers only banana hands and clusters, not whole bunches. Category : <i>SUBSTANTIVE</i></p>
275	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	C	<p>United States of America</p> <p>Consider listing the synonym <i>Fusarium odoratissimum</i> either in this cell or as footnote because it is used in the literature frequently. Category : <i>TECHNICAL</i></p>


276	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	P	<p>COSAVE</p> <p>Fruit is not considered a pathway according to the regional PRA. The fungus should be removed because is mainly spread through the movement of plants for planting, due to the presence of microconidia in the vascular bundles and infected banana residues (Davis, 2005). There is no evidence of Foc TR4 being spread through Musa spp. fruit.</p> <p>Category : <i>TECHNICAL</i></p>
277	249	<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	P	<p>Colombia</p> <p>Respecto a la inclusión de <i>Fusarium oxysporum</i> f.sp. <i>cubense</i> Raza 4 Tropical (Foc R4T), en el cuadro 1 y la mención de que las medidas de mitigación apropiadas para este patógeno son áreas libres o lugares de producción libres (Cuadro 3), respetuosamente se manifiesta la preocupación del mensaje erróneo que se está difundiendo. Lo anterior, teniendo en cuenta que investigaciones realizadas por el Laboratorio de Bioseguridad Vegetal del Departamento de Agricultura, Pesca y Silvicultura de Australia (DAFF, por su sigla en inglés), en las que se analizaron 451 muestras de tejido de fruto de banano Cavendish provenientes de plantas infectadas con Foc R4T, se concluyó que este patógeno no infecta el fruto (DAFF, 2018). Estudios adicionales confirman que incluso, en estados avanzados de la enfermedad, el fruto permanece libre de infección por Foc R4T (Daly & Walduck, 2006; Dita et al., 2010).</p> <p>La incorporación de esta plaga como asociada a la fruta fresca de Musa spp. para consumo humano constituye una medida injustificada que impone restricciones desproporcionadas al comercio internacional, con impactos sociales y económicos significativos para los países productores. Esta medida compromete la competitividad del sector, genera incertidumbre en los mercados y pone en riesgo miles de empleos directos e indirectos vinculados a esta cadena productiva.</p> <p>El informe del Comité de Normas celebrado del 12 al 16 de mayo de 2025, en Roma, Italia, indica que "Some SC members expressed doubt about whether Musa fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of Musa to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending</p>

				<p>consultation comments". No obstante, se considera que difundir esta información a nivel mundial sin una previa validación es una práctica no acertada, que genera confusiones y desinformación, promoviendo así medidas injustificadas por parte de países importadores y la utilización de los escasos recursos en implementar acciones que no se requieren o en su defecto haciendo las exportaciones inviables. Si bien se reconoce el derecho soberano de los países a establecer medidas fitosanitarias para proteger la sanidad vegetal, dicho derecho debe ejercerse sobre la base de criterios científicos y sin constituir obstáculos innecesarios al comercio internacional.</p> <p>Por lo tanto, y en concordancia con los principios establecidos en la NIMF No. 1, se solicita de manera categórica no difundir información contraria a la evidencia científica existente, la cual demuestra que Foc R4T no afecta el fruto fresco de Musa spp., y requerir este tipo de medidas fitosanitarias para esta plaga constituye una barrera al comercio, carente de justificación científica y contraria a los principios de la CIPF.</p> <p>Daly, A & Walduck, G. 2006. Fusarium wilt of banana (Panama disease). Agnote. 151(5). Dita, M. A., Waalwijk, C., Buddenhagen, I. W., Souza Jr, M. T. & Kema, G. H. J. 2010. A molecular diagnostic for tropical race 4 of the banana fusarium wilt pathogen. Plant Pathology. 59 (2). 348-357. Category : SUBSTANTIVE</p>
278	249	Fusarium oxysporum f.sp. cubense (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	P	<p>OIRSA</p> <p>Basado en Analisis de Riesgo relizado por OIRSA, el fruto no es vía. Retirar el hongo debido que el Foc RT4 se dispersa principalmente a través del movimiento de material de propagación vegetativa (material de siembra, partes de plantas). No hay evidencia sobre la dispersión de Foc R4T mediante frutos de banano Category : SUBSTANTIVE</p>
279	249	Fusarium oxysporum f.sp. cubense (E.F. Sm.) W.C. Snyder & H.N. Hansen, 1940, Tropical Race 4	C	<p>Ecuador</p> <p>No hay un sustento para que la fruta sea vía de Foc R4T. En la referencia del ARP realizado por Estados Unidos indica que la fruta no es una vía.</p> <p>Se sugiere eliminar esta plaga, ya que el anexo de la nimf es para fruta Category : TECHNICAL</p>
280	252	Phyllosticta cavendishii M.H. Wong & Crous, 2012	C	<p>Chile</p> <p>Muy baja probabilidad de transferencia a un hospedante adecuado en productos de consumo Category : EDITORIAL</p>
281	253	Bacteria	P	COSAVE

				See COSAVE comment in paragraph 258 <i>Category : TECHNICAL</i>
282	253	Bacteria	C	Cameroon L'usage prévu des bananes fraîches Musa spp. est la consommation humaine. Les doigts de bananes ne sont pas un matériel végétatif viable, donc il n'y a pas de justification technique d'inclure les bactéries dans cette liste <i>Category : TECHNICAL</i>
283	256	Bacteria	P	Costa Rica this pest will not follow the pathway <i>Category : SUBSTANTIVE</i>
284	256	Bacteria	C	United States of America Add new Pest Group for Viruses, with the following families and species Nanoviridae - banana bunchy top virus (BBTV) Caulimoviridae - Banana streak Virus (BSV) Bromoviridae - Cucumber mosaic virus (CMV) Potyvirus- Banana bract mosaic virus (BBRMV) (Wang et al., 2010) Additional considerations - BanMMV Notes: CMV - Helliot, B., Panis, B., Poumay, Y. et al. Cryopreservation for the elimination of cucumber mosaic and banana streak viruses from banana (Musa spp.). Plant Cell Rep 20, 1117-1122 (2002). https://doi.org/10.1007/s00299-002-0458-8 BBRMV - First Report of Banana bract mosaic virus in Flowering Ginger in Hawaii I.-C. Wang, D. M. Sether, M. J. Melzer, W. B. Borth, and J. S. Hu Plant Disease 2010 94:7, 921-921 https://apsjournals.apsnet.org/doi/abs/10.1094/PDIS-94-7-0921A Brazil Do you mean that the USA regulates viruses in fruit trade? Do you consider that Musa fruit is a pathway for this group of pests? <i>Category : TECHNICAL</i>
285	256	Bacteria	P	COSAVE See COSAVE comment in paragraph 258 <i>Category : TECHNICAL</i>
286	256	Bacteria	C	Madagascar Pourquoi on n'a pas mis Xanthomonas campestris pv. musae ou Xanthomonas spp. et Erwinia <i>Category : TECHNICAL</i>
287	257	Burkholderiaceae	C	Caribbean Agricultural Health and Food Safety Agency Extensive trade of the commodity indicates that this pest will not follow the pathway. Should be removed.

				Category : TECHNICAL
288	257	Burkholderiaceae	P	COSAVE See COSAVE comment in paragraph 258 Category : TECHNICAL
289	258	Races and strains of <i>Ralstonia solanacearum</i> (Smith 1896) Yabuuchi <i>et al.</i> 1996 emend. Safni <i>et al.</i> 2014 that affect <i>Musa</i> spp.	C	United States of America Consider separating out <i>Ralstonia syzygii</i> subsp. <i>celebesensis</i> (banana blood disease). Brazil Do you mean that the USA regulates bacteria in fruit trade? Do you consider that <i>Musa</i> fruit is a pathway for this pest? Category : TECHNICAL
290	258	Races and strains of <i>Ralstonia solanacearum</i> (Smith 1896) Yabuuchi <i>et al.</i> 1996 emend. Safni <i>et al.</i> 2014 that affect <i>Musa</i> spp.	P	COSAVE We suggest to remove it from the list because the fruit is not a pathway. Furthermore, damage caused by the pest prevents the production of commercial fruit. Category : TECHNICAL
291	258	Races and strains of <i>Ralstonia solanacearum</i> (Smith 1896) Yabuuchi <i>et al.</i> 1996 emend. Safni <i>et al.</i> 2014 that affect <i>Musa</i> spp.	C	Brazil <i>Ralstonia solanacearum</i> is spread over long distances primarily through the movement of infected planting material, soil adhering to such material, and contaminated tools and equipment. Infected banana plants exhibit wilting and typically fail to produce marketable fruit. There is no evidence that the bacterium is transmitted through infected banana fruit. Category : TECHNICAL
292	258	Races and strains of <i>Ralstonia solanacearum</i> (Smith 1896) Yabuuchi <i>et al.</i> 1996 emend. Safni <i>et al.</i> 2014 that affect <i>Musa</i> spp.	C	Chile Muy baja probabilidad de transferencia a un hospedante adecuado en productos de consumo Category : TECHNICAL
4. Options for phytosanitary measures				
293	261	4. Options for phytosanitary measures	C	Philippines Regarding treatment options, we propose that all visible insects be subject to export inspection, with specific measures requiring both SA 3 and export inspection for scale insects and aphids. Category : SUBSTANTIVE
294	261	4. Options for phytosanitary measures	C	PPPO The pest lists and tables are long and difficult to read. We appreciate the need to have these tables here as part of a standard, however, to facilitate implementation and use, especially as more commodity standards are developed, we consider development of a database containing this information would support contracting parties. We request the IPPC Secretariat to put this issue on the work program of the SC and the IC as a high priority. Category : SUBSTANTIVE
295	262	This section provides options for phytosanitary measures that may be relevant for the pests listed in Table 1. The options presented are not exhaustive and contracting parties may consider other options as phytosanitary measures.	P	EPPO Addition needed to be in line with the text agreed for mango and with the draft annex on Taro.

				<i>Category : TECHNICAL</i>
296	263	Table 2 provides general options for phytosanitary measures that may be relevant to pests listed in Table 1.	P	Costa Rica By removing most of the pests listed in Table 1, only species directly associated with fruit and the intended use should be considered. Accordingly, risk mitigation measures should be defined in line with the relevant pests and the intended use of the product. <i>Category : TECHNICAL</i>
297	263	Table 2 provides general options for phytosanitary measures that may be relevant to pests listed in Table 1.	C	Philippines The Philippines requests clarification on whether the measures in the "Options for phytosanitary measures" section may be applied individually or in combination. <i>Category : SUBSTANTIVE</i>
298	263	Table 2 provides general options for phytosanitary measures that may be relevant to <u>any</u> pests listed in Table 1.	P	Brazil General options listed in Table 2 can be applied for any pest. <i>Category : EDITORIAL</i>
299	264	Table 3 lists some specific options for managing the risk of some of the pests listed in Table 1, with further details in Table 4 and Table 5. Table 3 lists some pest-specific options to manage the pest risk of pests listed in Table 1, with further details in Table 4 and Table 5. Abbreviations used for options for phytosanitary measures are listed in Box 1, as well as below in relevant tables.	P	Colombia Translation Enhancement <i>Category : TRANSLATION</i>
300	264	Table 3 lists some pest-specific options to manage the pest risk of pests listed in Table 1, with further details in Table 4 and Table 5. Abbreviations used for options for phytosanitary measures are listed in <u>Box 1</u> , as well as below in relevant tables.	C	EPPO There is no need to have the box, as it duplicates the wording under the tables. <i>Category : TECHNICAL</i>
301	264	En el Cuadro 3 se enumeran algunas opciones específicas para manejar el riesgo de algunas de las plagas enumeradas en el Cuadro 1, de las que se ofrece información más detallada en los cuadros 4 y 5. En el Cuadro 3 se enumeran algunas opciones específicas para ciertas plagas para manejar el riesgo de plagas de las plagas enumeradas en el Cuadro 1, de las que se ofrece información más detallada en los cuadros 4 y 5. Las abreviaturas utilizadas para las opciones de medidas fitosanitarias se indican en el Recuadro 1, así como más adelante en los cuadros pertinentes.	P	Colombia Mejora de traducción <i>Category : TRANSLATION</i>
302	264	En el Cuadro 3 se enumeran algunas opciones específicas para ciertas plagas para manejar el riesgo de plagas de las plagas enumeradas en el Cuadro 1, de las que se ofrece información más detallada en los cuadros 4 y 5. Las abreviaturas utilizadas para las opciones de medidas fitosanitarias se indican en el Recuadro 1, así como más adelante en los cuadros pertinentes.	C	Ecuador Corrección de texto texto sugerido: En el Cuadro 3 se enumeran algunas opciones específicas para el manejo de riesgo de ciertas plagas enumeradas en el Cuadro 1, de las que se ofrece información más detallada en los cuadros 4 y 5. Las abreviaturas utilizadas para las opciones de medidas fitosanitarias se indican en el Recuadro 1, así como más adelante en los cuadros pertinentes. <i>Category : EDITORIAL</i>

303	265	Importing-country NPPOs should decide whether the options listed in Table 3 are effective at managing the pest risk to an acceptable level before selecting them as phytosanitary measures. Importing-country NPPOs should also consider whether a measure for one pest will effectively manage the pest risk of other regulated pests of <i>Musa</i> spp. fruit. In addition, when applying these options as phytosanitary measures, NPPOs should consider <u>and document</u> the procedures for successful application.	P	Australia To make it clear that documentation is necessary for successful application of the measure. <i>Category : SUBSTANTIVE</i>
304	265	Importing-country NPPOs should decide whether the options listed in Table 3 are effective at managing the pest risk to an acceptable level before selecting them as phytosanitary measures. Importing-country NPPOs <u>They</u> should also consider whether a measure for one-a particular pest will effectively manage the pest risk of other regulated pests of <u>the fruit of</u> <i>Musa</i> spp. fruit. In addition, when applying these options as phytosanitary measures, NPPOs should consider the procedures for successful application.	P	Colombia Improved wording, due to the fact that the word plague is mentioned repeatedly. <i>Category : EDITORIAL</i>
305	265	Importing-country NPPOs should decide whether the options listed in Table 3 are effective at managing the pest risk to an acceptable level before selecting them as phytosanitary measures. Importing-country NPPOs should also consider whether a measure for one pest will effectively manage the pest risk of other regulated pests of <i>Musa</i> spp. fruit. In addition, when applying these options as phytosanitary measures, NPPOs should consider <u>and document</u> the procedures for successful application.	P	PPPO To make it clear that documentation is necessary for successful application of the measure. <i>Category : SUBSTANTIVE</i>
306	265	Importing-country NPPOs <u>The NPPO of importing country</u> should decide whether the options listed in Table 3 are effective at managing the pest risk to an acceptable level before selecting them as phytosanitary measures. Importing-country NPPOs <u>The NPPO of importing country</u> should also consider whether a measure for one pest will effectively manage the pest risk of other regulated pests of <i>Musa</i> spp. fruit. In addition, when applying these options as phytosanitary measures, NPPOs should consider the procedures for successful application.	P	 Thailand Egypt to be consistent with what was mentioned into point 3 <i>Category : EDITORIAL</i>
307	265	Las ONPF de los países importadores deberían decidir si las opciones enumeradas en el Cuadro 3 son eficaces para manejar el riesgo de plagas a un nivel aceptable antes de seleccionarlasy como medidas fitosanitarias. Asimismo, deberían considerar si una medida para una plaga determinada permitirá manejar eficazmente el riesgo de plagas de otras plagas reglamentadas del fruto de <u>Musa</u> spp. Musa spp. Además, al aplicar estas opciones como medidas fitosanitarias, las ONPF deberían considerar los procedimientos para su aplicación eficaz.	P	Colombia Mejora de redacción, debido a que la palabra plaga se menciona de manera repetitiva. <i>Category : EDITORIAL</i>
308	266	Options for phytosanitary measures included in this commodity standard may be effective at managing pest risk when used alone or when integrated with other	P	Colombia A comma is missing (,) <i>Category : EDITORIAL</i>

		measures in a systems approach <u>approach</u> , as described in ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>).		
309	266	Las opciones de medidas fitosanitarias incluidas en esta norma para productos podrán ser eficaces para manejar el riesgo de plagas usadas por sí solas o integradas con otras medidas en un enfoque de sistemas <u>sistemas</u> , tal como se describe en la NIMF 14 (<i>Aplicación de medidas integradas en un enfoque de sistemas para el manejo del riesgo de plagas</i>).	P	Colombia Falta una coma (,) Category : EDITORIAL
310	267	Phytosanitary treatments <u>Treatments</u> (PTs) that have been adopted by the Commission on Phytosanitary Measures as annexes to ISPM 28 (<i>Phytosanitary treatments for regulated pests</i>) are shown in bold in Table 3 and Table 4.	P	Colombia When mentioning an acronym for the first time in a document, the first letter of each word must be capitalized Category : EDITORIAL
311	267	Los tratamientos fitosanitarios <u>Tratamientos Fitosanitarios</u> (TF) que la CMF ha aprobado como anexos a la NIMF 28 (<i>Tratamientos fitosanitarios para plagas reglamentadas</i>) se muestran en negrita en los cuadros 3 y 4.	P	Colombia Al mencionar por primera vez una sigla en un documento se debe escribir la primera letra de cada palabra en mayúscula Category : EDITORIAL
312	268	Table 2. General options for phytosanitary measures	C	Australia Any pest that is managed by a general measure in international trade should be maintained on the list and the general measure listed against that pest. We understand general measures can be used against any pest, however they are established and impose against specific pests for specific purposes and so for the purpose of international trade are not general but rather specific. A paper will be developed for the SC's consideration in November 2025 and will impact the procedures of the TPCS. Category : SUBSTANTIVE
313	268	Table 2. General options for phytosanitary measures	C	IPPC Regional Workshop Africa Highlight equivalence of measures explicitly to give NPPOs flexibility in applying risk management options. Rational: Supports trade facilitation and fair implementation where capacities differ among contracting parties. Category : TECHNICAL
314	268	Table 2. General options for phytosanitary measures	C	PPPO Include a brief description of each ISPM to make measures more actionable e.g. ISPM 4 establishing pest free areas through surveillance and control. Category : SUBSTANTIVE
315	268	Table 2. General options for phytosanitary measures	C	PPPO Any pest that is managed by a general measure in international trade should be maintained on the list and the general measure listed against that pest. We understand general measures can be used against any pest, however, they are established and imposed against specific pests for specific purposes and so for the purpose of international trade are not general but rather specific. A paper will be developed for the Standards Committee's consideration in November 2025 and will impact the procedures of the TPCS.

				<i>Category : SUBSTANTIVE</i>
316	268	Table 2. General options for phytosanitary measures	C	<p>Kenya Highlight equivalence of measures explicitly to give NPPOs flexibility in applying risk management options.</p> <p>Kenya Supports trade facilitation and fair implementation where capacities differ among contracting parties</p> <p><i>Category : TECHNICAL</i></p>
317	268	Table 2. General options for phytosanitary measures	C	<p>Kenya Highlight equivalence of measures explicitly to give NPPOs flexibility in applying risk management options. Rational: Supports trade facilitation and fair implementation where capacities differ among contracting parties.</p> <p><i>Category : TECHNICAL</i></p>
318	268	Cuadro 2. Opciones generales de medidas fitosanitarias	C	<p>Panama En relación a la lista de plagas del cuadro 1, que no siguen la vía, para estas plagas se listan medidas fitosanitarias que muchos países de la región latinoamericana no están en capacidad de cumplir y que no justificadas son consideraras restrictivas al comercio.</p> <p><i>Category : SUBSTANTIVE</i></p>
319	268	Cuadro 2. Opciones generales de medidas fitosanitarias	P	<p>OIRSA Eliminar las medidas fitosanitarias generales: debido al vínculo de plagas que no están asociadas al producto; por lo que pueden crearse obstáculos innecesarios al comercio de Musáceas</p> <p><i>Category : SUBSTANTIVE</i></p>
320	271	Pest free areas areas (PFA)	P	<p>COSAVE Consequential change due to the proposal to delete Box 1</p> <p><i>Category : EDITORIAL</i></p>
321	272	ISPM 4 (<i>Requirements for the establishment of pest free areas</i>)	C	<p>Australia To aid implementation, it is proposed that a short description of the ISPMs listed here be included. It is considered that standard words could be developed for this but a proposal, to illustrate the concept is to include "Establishment of pest free areas through surveillance and control".</p> <p><i>Category : SUBSTANTIVE</i></p>
322	272	ISPM 4 (<i>Requirements for the establishment of pest free areas</i>)	C	<p>PPPO Add a brief outline of the ISPM so it is more useable by the reader.</p> <p><i>Category : SUBSTANTIVE</i></p>
323	274	Pest free places of production and pest free production sites sites (PFPP)	P	<p>COSAVE Consequential change due to the proposal to delete Box 1</p> <p><i>Category : EDITORIAL</i></p>
324	278	Systems approaches approaches (SA)	P	<p>COSAVE Consequential change due to the proposal to delete Box 1</p> <p><i>Category : EDITORIAL</i></p>
325	281	Specific physiological stage of maturity at harvest (e.g. hard green, mature green)	C	<p>IPPC Regional Workshop Africa Provide technical guidance or thresholds for determining acceptable physiological maturity stages e.g. hard green and</p>

				testing methods. Rational : Current reference to "specific physiological stage" is ambiguous ,there is need to harmonize guidance for application. <i>Category : TECHNICAL</i>
326	281	Specific physiological stage of maturity at harvest (e.g. hard green, mature green)	P	Kenya Provide technical guidance or thresholds for determining acceptable physiological maturity stages e.g. hard green and testing methods. Rational : Current reference to "specific physiological stage" is ambiguous ,there is need to harmonize guidance for application. <i>Category : TECHNICAL</i>
327	285	ISPM 28 (Phytosanitary treatments for regulated pests) ISPM 18 (Requirements for the use of irradiation as a phytosanitary measure); ISPM 28 (Phytosanitary treatments for regulated pests)	P	Colombia The reference to ISPM 18 on irradiance appears only in the notes to Table 4, but should also be mentioned in Table 2 of general options. <i>Category : TECHNICAL</i>
328	285	NIMF 28 (Tratamientos fitosanitarios para plagas reglamentadas)	P	Colombia "NIMF 18 (Requisitos para el uso de la irradiación como medida fitosanitaria); NIMF 28 (Tratamientos fitosanitarios para plagas reglamentadas)". <i>Category : TECHNICAL</i>
329	286	Inspection Inspection et control	P	Senegal <i>Category : TECHNICAL</i>
330	286	Phytosanitary Inspection	P	NEPPO <i>Category : SUBSTANTIVE</i>
331	286	Inspection	C	IPPC Regional Workshop Africa Reduce over-reliance on export inspection alone, especially for soil-borne and internal pests (e.g. Fusarium TR4, Ralstonia solanacearum). Strengthen use of PFPP and systems approaches. Rational: Visual inspection alone is insufficient for certain pests; integrated measures are more effective. <i>Category : TECHNICAL</i>
332	286	Inspection	P	Kenya Reduce over-reliance on export inspection alone, especially for soil-borne and internal pests (e.g. Fusarium TR4, Ralstonia solanacearum). Strengthen use of PFPP and systems approaches. Rational: Visual inspection alone is insufficient for certain pests; integrated measures are more effective. <i>Category : TECHNICAL</i>
333	286	Inspection	C	Kenya Reduce over-reliance on export inspection alone, especially for soil-borne and internal pests (e.g. Fusarium TR4, Ralstonia solanacearum). Strengthen use of PFPP and systems approaches. Kenya Visual inspection alone is insufficient for certain pests;

				integrated measures are more effective. <i>Category : TECHNICAL</i>
334	288	ISPM 31 (<i>Methodologies for sampling of consignments</i>) ISPM 20 (Guidelines for a phytosanitary import regulatory system).	P	NEPPO <i>Category : TECHNICAL</i>
335	290	NIMP 27 (protocole de diagnostic pour les organismes nuisibles réglementés Traitements phytosanitaires contre les organismes nuisibles réglementés)	P	IPPC Regional Workshop Africa c'est la norme 27 qui fait référence au protocole de diagnostic <i>Category : TECHNICAL</i>
336	295	Box 1. Abbreviations used in this commodity standard for options for phytosanitary measures	P	EPPO see earlier comment <i>Category : SUBSTANTIVE</i>
337	295	Box 1. Abbreviations used in this commodity standard for options for phytosanitary measures	P	COSAVE We suggest to delete Box 1 and to include the abbreviations in Table 2 <i>Category : EDITORIAL</i>
338	296	IRDN	P	COSAVE Deleted because abbreviation is included in the footnote of the Table to avoid duplication <i>Category : EDITORIAL</i>
339	297	Irradiation	C	Caribbean Agricultural Health and Food Safety Agency While irradiation is a valid phytosanitary treatment, the high cost of using the treatment may render it impractical for developing countries. <i>Category : SUBSTANTIVE</i>
340	297	Irradiation	P	COSAVE See COSAVE comment in paragraph 296 <i>Category : EDITORIAL</i>
341	298	PFA	P	COSAVE See COSAVE comment in paragraph 271 <i>Category : EDITORIAL</i>
342	299	pest free area	P	COSAVE See COSAVE comment in paragraph 271 <i>Category : EDITORIAL</i>
343	300	PFPP	P	COSAVE See COSAVE comment in paragraph 274 <i>Category : EDITORIAL</i>
344	301	pest free place of production	P	COSAVE See COSAVE comment in paragraph 274 <i>Category : EDITORIAL</i>
345	301	pest free place of production	C	Egypt to add PFPS as an abbreviation , Pest Free Production Site <i>Category : TECHNICAL</i>
346	302	SA	P	COSAVE See COSAVE comment in paragraph 278 <i>Category : EDITORIAL</i>
347	303	systems approach	P	COSAVE See COSAVE comment in paragraph 278

				<i>Category : EDITORIAL</i>
348	304	Table 3. Pest specific options for phytosanitary measures	P	Costa Rica By removing most of the pests listed in Table 1, only species directly associated with fruit and the intended use should be considered. Accordingly, risk mitigation measures should be defined in line with the relevant pests and the intended use of the product. <i>Category : TECHNICAL</i>
349	304	Table 3. Pest-specific options for phytosanitary measures	C	IPPC Regional Workshop Africa Highlight equivalence of measures explicitly to give NPPOs flexibility in applying risk management options. Rational: Supports trade facilitation and fair implementation where capacities differ among contracting parties. <i>Category : TECHNICAL</i>
350	304	Cuadro 3. Opciones de medidas fitosanitarias específicas para ciertas plagas	P	OIRSA Por consistencia con la sugerencia de eliminar la plaga de la lista, seria de eliminar las medidas Fitosanitarias por falta de sustento <i>Category : SUBSTANTIVE</i>
351	306	Options for phytosanitary measures	C	Brazil Some measures are repeated in both tables 2 and 3. PFA, PFPP and export inspection are general measures or pest-specific ones? Table 3 should list only specific measures (specific SA, specific treatments, stage of maturity...) <i>Category : SUBSTANTIVE</i>
352	309	<i>Oligonychus orthius</i>	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
353	310	Export inspection*	C	EPPO There should be an explanation, justification, reference, and/or methodology for this and all other mentions of export inspection to be in the pest specific options table. Without this information, there is no need to include it in the pest specific options table, as it is already covered in the general options table 2 (paragraph 286). We think that an additional table would be useful for the phytosanitary measures mentioned in table 3 that currently do not have any information (e.g., export inspection, PFA, PFPP, specific physiological stage of maturity at harvest) – as done in table 5 for SA. This would provide useful information to countries when considering whether to use a measure. This specific comment is valid also for for “specific physiological stage of maturity at harvest” as well. <i>Category : SUBSTANTIVE</i>
354	310	Export inspection*	P	COSAVE

				It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
355	311	<i>Oligonychus velascoi</i>	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
356	312	Export inspection*	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
357	314	Export-Phytosanitary inspection*	P	NEPPO <i>Category : TECHNICAL</i>
358	315	<i>Tetranychus piercei</i>	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
359	316	Export-phytosanitary inspection*	P	NEPPO <i>Category : TECHNICAL</i>
360	316	Export inspection*	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
361	317	Fruit flies	P	Colombia On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU." However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and

			<p>risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
362	317	Moscas de la fruta	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben</p>

			<p>promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
363	319	<i>Bactrocera bryoniae</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p>

				<p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
364	319	<i>Bactrocera bryoniae</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo “Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory” el cual indica que “En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones</p>

				como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario. <i>Category : SUBSTANTIVE</i>
365	320	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	C	EPPO There should be an explanation, justification, reference, and/or methodology for this and other mentions of PFA in the pest specific options table. Without this information, there is no need to include it in the pest specific options table, as it is already covered in the general options table 2 (paragraph 271). See comment on paragraph 310 for more detail. <i>Category : SUBSTANTIVE</i>
366	320	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	C	Oman If we delete Box 1, the meaning of the term IRDN will be ambiguous. <i>Category : SUBSTANTIVE</i>
367	320	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	COSAVE PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i>
368	321	<i>Bactrocera carambolae</i>	P	Colombia On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU." However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate

			<p>level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
369	321	<i>Bactrocera carambolae</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP</p>

			<p>y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
370	322	Export inspection;* IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments,</p>

				systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i>
371	322	Export inspection ; *inspection ; IRDN 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	P	EPPO The asterisk is in the wrong place. It should be placed before the semicolon. <i>Category : EDITORIAL</i>
372	322	Export inspection ; *inspection ; IRDN 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	P	New Zealand The asterisk needs to be before the semicolon. A global check is needed <i>Category : EDITORIAL</i>
373	322	Export inspection ; *IRDN 4 ; PFA ; SA 1; specific physiological stage of maturity at harvest	P	COSAVE PRA and export inspections are general measures that apply to any pest and are included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i>
374	322	Inspección de las exportaciones ; *IRDN 4 ; ALP ; ES 1 ; etapa específica de maduración fisiológica en el momento de la recolección	P	Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno". No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.

			<p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
375	323	<i>Bactrocera caryeae</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country</p>

			<p>and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
376	323	<i>Bactrocera caryeae</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo “Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory” el cual indica que “En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente</p>

			<p>áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
377	324	Export inspection;* IRDN 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary.</p>

				<i>Category : SUBSTANTIVE</i>
378	324	Export inspection;* inspection* ; IRDN 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	P	EPPO See comment for paragraph 322. <i>Category : EDITORIAL</i>
379	324	Export inspection;* IRDN 4 ; PFA ; SA 1; specific physiological stage of maturity at harvest	P	COSAVE PRA and export inspections are general measures that apply to any pest and are included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i>
380	324	Inspección de las exportaciones* ; IRDN 4 ; ALP ; ES 1 ; etapa específica de maduración fisiológica en el momento de la recolección	P	Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno". No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria. Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador. La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de

				<p>sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
381	325	<i>Bactrocera cucumis</i>	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary.</p> <p><i>Category : SUBSTANTIVE</i></p>

382	325	<i>Bactrocera cucumis</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
383	326	<i>IRDN-4; PFA; SA 1; specific physiological stage of maturity at harvest</i>	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the</p>

				<p>species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
384	326	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
385	326	IRDN 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific</p>

			<p>opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory” el cual indica que “En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
386	327	<i>Bactrocera dorsalis</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European</p>

			<p>Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
387	327	<i>Bactrocera dorsalis</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase</p>

			<p>verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario. <i>Category : SUBSTANTIVE</i></p>
388	328	Export inspection;* IRDN 3, 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one</p>

				<p>are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
389	328	Export inspection ; *inspection* ; IRDN 3, 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>EPPO</p> <p>See comment for paragraph 322. <i>Category : EDITORIAL</i></p>
390	328	Export inspection ; *IRDN 3, 4 ; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PRA and export inspections are general measures that apply to any pest and are included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
391	328	Inspección de las exportaciones ; *IRDN 3, 4 ; ALP ; ES 1 ; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la</p>

			<p>industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
392	329	<i>Bactrocera facialis</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p>

			<p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
393	329	<i>Bactrocera facialis</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección</p>

			<p>fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
394	330	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should</p>

				<p>be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
395	330	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
396	330	IRDN-4; ALP; ES-1; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP</p>

			<p>y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
397	331	<i>Bactrocera frauenfeldi</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the</p>

				<p>same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
398	331	<i>Bactrocera frauenfeldi</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas</p>

				medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario. <i>Category : SUBSTANTIVE</i>
399	332	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
400	332	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	COSAVE

				<p>PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango).</p> <p><i>Category : TECHNICAL</i></p>
401	332	IRDN-4; ALP; ES-1; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>

402	333	<i>Bactrocera jarvisi</i>	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
403	333	<i>Bactrocera jarvisi</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of</p>

			<p>non-EU Tephritidae into the EU territory” el cual indica que “En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
404	334	IRDN 2, 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and</p>

			<p>plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
405	334	IRDN 2, 4; PFA ; SA 1; specific physiological stage of maturity at harvest	<p>P COSAVE</p> <p>PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
406	334	IRDN 2, 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos)</p>

			<p>podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
407	335	<i>Bactrocera kandiensis</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the</p>

			<p>evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
408	335	<i>Bactrocera kandiensis</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p>

				<p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
409	336	Export inspection;* IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and</p>

				<p>risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
410	336	Export inspection ; IRDN 4 ; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PRA and export inspections are general measures that apply to any pest and are included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
411	336	Inspección de las exportaciones ; IRDN 4 ; ALP ; ES 1 ; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo</p>

			<p>impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
412	337	<i>Bactrocera kirki</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p>

			<p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
413	337	<i>Bactrocera kirki</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso</p>

			<p>previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
414	338	IRDN-4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads</p>

			importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i>
415	338	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P COSAVE PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i>
416	338	IRDN 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno". No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria. Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador. La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente

			<p>áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
417	339	<i>Bactrocera kraussi</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary.</p>

418	339	<i>Bactrocera kraussi</i>	P	<p><i>Category : SUBSTANTIVE</i></p> <p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo “Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory” el cual indica que “En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
419	340	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>Colombia</p>

				<p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
420	340	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
421	340	IRDN 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica</p>

			<p>existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario. <i>Category : SUBSTANTIVE</i></p>
422	341	<i>Bactrocera musae</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states</p>

				<p>that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
423	341	<i>Bactrocera musae</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión</p>

			<p>de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
424	342	IRDN-4; PFA; SA-1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices</p>

				<p>ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
425	342	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>European Union</p> <p>As Bactrocera musae can lay eggs in Green bananas, the measure does not apply to it. The measure is mainly for bananas harvested Green. See also EPPO comment on paragraph 538. <i>Category : TECHNICAL</i></p>
426	342	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>EPPO</p> <p>As Bactrocera musae can lay eggs in Green bananas, the measure does not apply to it. The measure is mainly for bananas harvested in Green. See also EPPO comment on paragraph 538. <i>Category : TECHNICAL</i></p>
427	342	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>New Zealand</p> <p>Propose deleting this measure. B. musae is a specialised banana fruit fly. This measure is not effective for this species. B. musa can infest green bananas and mature from green bananas (unlike other fruit flies seem not to be able to).</p> <p>The researcher used both field data and choice and no-choice exposure experiments to resolve the question.</p> <p>Reference: Mararuai A. (2010) Market access of Papua New Guinea Bananas (Musa spp.) with particular respect to Banana fly (Bactrocera musae (Tryon)) (Diptera: Tephritidae). PhD Thesis, School of Natural Resource Sciences, Queensland University of Technology, Australia.</p>

				See table 4.2 (pages 97- 98) and figures 5.3 and 5.4 (pages 114-115) for some results. Paper can be provided if requested. <i>Category : SUBSTANTIVE</i>
428	342	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	COSAVE PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i>
429	342	IRDN 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P	Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno". No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria. Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador. La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de

				<p>sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
430	343	<i>Bactrocera neohumeralis</i>	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary.</p> <p><i>Category : SUBSTANTIVE</i></p>

431	343	<i>Bactrocera neohumeralis</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
432	344	<i>IRDN-4; PFA; SA 1; specific physiological stage of maturity at harvest</i>	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the</p>

				<p>species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
433	344	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
434	344	IRDN 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific</p>

			<p>opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory” el cual indica que “En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
435	345	<i>Bactrocera occipitalis</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European</p>

				<p>Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
436	345	<i>Bactrocera occipitalis</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase</p>

			<p>verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
437	346	Export inspection;* IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one</p>

				<p>are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
438	346	Export inspection ; *inspection* ; IRDN 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>EPPO</p> <p>See comment for paragraph 322. <i>Category : EDITORIAL</i></p>
439	346	Export inspection ; *IRDN 4 ; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PRA and export inspections are general measures that apply to any pest and are included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
440	346	Inspección de las exportaciones ; *IRDN 4 ; ALP ; ES 1 ; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la</p>

			<p>industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
441	347	<i>Bactrocera pyrifoliae</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p>

			<p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
442	347	<i>Bactrocera pyrifoliae</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección</p>

			<p>fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
443	348	Export inspection; IRDN 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should</p>

				<p>be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
444	348	Export inspection; *inspection* ; IRDN 4 ; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>EPPO See comment for paragraph 322. <i>Category : EDITORIAL</i></p>
445	348	Export inspection; * IRDN 4 ; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE PRA and export inspections are general measures that apply to any pest and are included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
446	348	Inspección de las exportaciones*; IRDN 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p>

			<p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p>Category : <i>SUBSTANTIVE</i></p>
447	349	<i>Bactrocera tryoni</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus <i>Bactrocera</i> and <i>Ceratitis</i>, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country</p>

			<p>and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
448	349	<i>Bactrocera tryoni</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de</p>

			<p>sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
449	350	Export inspection;* IRDN 2, 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates</p>

				pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i>
450	350	Export inspection ^{inspection*} ; IRDN 2, 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	EPPO See comment for paragraph 322. <i>Category : EDITORIAL</i>
451	350	Export inspection ^{inspection*} ; IRDN 2, 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	COSAVE PRA and export inspections are general measures that apply to any pest and are included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i>
452	350	Inspección de las exportaciones* ; IRDN 2, 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P	Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno". No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria. Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador. La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones

				<p>como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
453	351	<i>Ceratitidis capitata</i>	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitidis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary.</p>

				Category : SUBSTANTIVE
454	351	<i>Ceratitis capitata</i>	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p>Category : SUBSTANTIVE</p>
455	352	IRDN 2, 4; PFA; SA 1; specific physiological stage of maturity at harvest	P	<p>Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the</p>

			<p>existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
456	352	IRDN 2, 4; PFA ; SA 1; specific physiological stage of maturity at harvest	<p>P COSAVE PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
457	352	IRDN 2, 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	<p>P Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitis</i>, ignorando la evidencia científica</p>

			<p>existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefrítidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
458	353	<i>Ceratitis cosyra</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European</p>

			<p>Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of <i>B. dorsalis</i> and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
459	353	<i>Ceratitidis-cosyra</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género <i>Bactrocera</i> y <i>Ceratitidis</i>, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de <i>B. dorsalis</i> y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión</p>

			<p>de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefrítidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
460	354	IRDN 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one</p>

				<p>are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
461	354	IRDN 4; PFA ; SA 1; specific physiological stage of maturity at harvest	P	<p>COSAVE</p> <p>PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
462	354	IRDN 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	P	<p>Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y</p>

			<p>plátanos maduros en fase verde uno”.</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario. <i>Category : SUBSTANTIVE</i></p>
463	355	<i>Zeugodacus tau</i>	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritides, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free</p>


			<p>areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country and the intended use in the importing country.</p> <p>The issuance of documents by the IPPC indicating that, for the same level of risk, pest-free areas, phytosanitary treatments, systems approaches, independent measures or export inspection can be applied indistinctly as equivalent alternatives, leads importing countries to interpret them as equally applicable. However, these measures differ significantly in technical complexity, costs, and feasibility. This misperception creates pressure to adopt more restrictive measures than necessary. <i>Category : SUBSTANTIVE</i></p>
464	355	<i>Zeugodacus tau</i>	<p>P Colombia</p> <p>Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p>

			<p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
465	356	IRDN 1, 4; PFA; SA 1; specific physiological stage of maturity at harvest	<p>P Colombia</p> <p>On the other hand, mitigation measures are included for the species of the genus Bactrocera and Ceratitis, ignoring the existing scientific evidence issued by EFSA (2021) in the article "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" which states that "In response to the question posed by the European Commission to the European Food Safety Authority (EFSA) on whether the commercial import of Musa fruits (bananas and plantains) could constitute a potential route for the introduction of B. dorsalis and other non-Community tephritids, of which Musa fruits are hosts, EFSA's Plant Health Panel reported that it does not constitute a pathway. This is based on a review of the evidence demonstrating: i) bananas and plantains in the green phase are not hosts for oviposition or for the subsequent development of tephritid immatures and ii) industry practices ensure that only ripe bananas and plantains in green phase one are exported to the EU."</p> <p>However, despite the evidence analyzed and presented by EFSA (2021), the draft annex insists on adding measures such as free areas, system approaches, and phytosanitary treatments, contradicting the principles of necessity, minimum impact, and risk management of ISPM No. 1, which determine that the least restrictive mitigation alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In addition, mitigation measures should not be promoted in a generalized manner or as interchangeable alternatives, but should be based on an ARP and consider the specific characteristics of the pest, the product, the production system of the exporting country</p>

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466	356	IRDN 1, 4; PFA ; SA 1; specific physiological stage of maturity at harvest	<p>P COSAVE PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i></p>
467	356	IRDN 1, 4; ALP; ES 1; etapa específica de maduración fisiológica en el momento de la recolección	<p>P Colombia Por otro lado, se incluyen medidas de mitigación para las especies del género Bactrocera y Ceratitis, ignorando la evidencia científica existente y emitida por EFSA (2021) en el artículo "Scientific opinion on the import of Musa fruits as a pathway for the entry of non-EU Tephritidae into the EU territory" el cual indica que "En respuesta a la pregunta planteada por la Comisión Europea a la Autoridad Europea de Seguridad Alimentaria (EFSA) sobre si la importación comercial de frutos de Musa (bananos y plátanos) podría constituir una vía potencial para la introducción de B. dorsalis y otros tefritidos no comunitarios, de los cuales los frutos de Musa son hospedantes, el Panel de Sanidad Vegetal de la EFSA informó que no constituye una vía. Esto se basa en una revisión de la evidencia que demuestra: i) los bananos y plátanos en fase verde no son hospedantes para la oviposición ni para el posterior desarrollo de inmaduros de tefritidos y ii) las prácticas de la industria garantizan que solo se exporten a la UE bananos y plátanos maduros en fase verde uno".</p> <p>No obstante, a pesar de la evidencia analizada y presentada por EFSA (2021), el proyecto de anexo insiste en adicionar medidas como áreas libres, enfoques de sistemas y tratamientos fitosanitarios, contradiciendo los principios de necesidad, mínimo impacto y gestión del riesgo de la NIMF No. 1, los cuales determinan que se debe optar por la alternativa de mitigación menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>Adicional, las medidas de mitigación, se aclara que estas no deben promoverse de forma generalizada ni como alternativas intercambiables, sino que deben estar fundamentadas en un ARP</p>

				<p>y considerar las características específicas de la plaga, el producto, el sistema de producción del país exportador y el uso previsto en el país importador.</p> <p>La emisión de documentos por parte de la CIPF que indican que, para un mismo nivel de riesgo, pueden aplicarse indistintamente áreas libres de plagas, tratamientos fitosanitarios, enfoques de sistemas, medidas independientes o inspección de exportaciones como alternativas equivalentes, lleva a los países importadores a interpretarlas como igualmente aplicables. Sin embargo, estas medidas difieren significativamente en complejidad técnica, costos y viabilidad. Esta percepción errónea genera presión para adoptar medidas más restrictivas de lo necesario.</p> <p><i>Category : SUBSTANTIVE</i></p>
468	360	Field and export <u>Export</u> inspection†	P	<p>Colombia</p> <p>Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources.</p> <p><i>Category : SUBSTANTIVE</i></p>
469	360	Inspección <u>Inspección</u> de campo y de las exportaciones†	P	<p>Colombia</p> <p>La inspección en campo con fines de certificación fitosanitaria en campo, no es sostenible de acuerdo a los recursos logísticos, humanos, operáticos y financieros.</p> <p><i>Category : SUBSTANTIVE</i></p>
470	361	Mealybugs and scales	C	<p>Caribbean Agricultural Health and Food Safety Agency</p> <p>Consider including washing and disinfection as a treatment for mealybugs and scales as this is a common practice, not just as a part of systems approach but as a stand-alone treatment</p> <p><i>Category : TECHNICAL</i></p>
471	363	Aspidiotus coryphae	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1</p> <p><i>Category : TECHNICAL</i></p>
472	364	Export inspection*	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1</p> <p><i>Category : TECHNICAL</i></p>
473	365	Aspidiotus destructor	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1</p> <p><i>Category : TECHNICAL</i></p>
474	366	SA-3 <u>Export Inspection</u>	P	<p>Colombia</p> <p>The inclusion of the systems approach measure does not correspond to the real level of risk, since there is no prior technical-scientific analysis to support its need or proportion. It is essential to keep in mind, although it is indicated that countries must carry out their own review and risk analysis, when a measure is presented within an ISPM, importing countries assume</p>

				it as a valid and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself. <i>Category : SUBSTANTIVE</i>
475	366	SA-3	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
476	366	ES-3 Inspección de las exportaciones.	P	Colombia La inclusión de la medida de enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental tener en cuenta, aunque se indique que los países deben realizar su propia revisión y análisis de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF. <i>Category : SUBSTANTIVE</i>
477	367	<i>Aspidiotus excisus</i>	C	United States of America Add new rows for: Ceroplasted rubens - Export inspection; * IRDN 8 Coccus viridis - field and export inspection + (removing any infected fruit at packing) <i>Category : TECHNICAL</i>
478	367	Aspidiotus excisus	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
479	368	Export inspection; SA-3	P	Colombia The inclusion of the systems approach measure does not correspond to the real level of risk, since there is no prior technical-scientific analysis to support its need or proportion. It is essential to keep in mind, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid

				and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself. When several mitigation options with different levels of complexity are presented for the same risk—such as the generation of a systems approach (SE) or export inspection—the latter, which demonstrates its effectiveness in reducing risk, should be prioritized, without the need to apply more or more complex and costly measures. <i>Category : SUBSTANTIVE</i>
480	368	Export inspection;* SA 3	C	EPPO The SA3 reference in table 5 does not cover <i>Aspidiotus excisus</i> . <i>Category : SUBSTANTIVE</i>
481	368	Export inspection;* inspection* ; SA 3	P	EPPO See comment for paragraph 322. <i>Category : EDITORIAL</i>
482	368	Export inspection;* SA 3	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
483	368	Inspección de las exportaciones*; ES 3	P	Colombia La inclusión de la medida de enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental tener en cuenta, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF. Cuando se presenta para un mismo riesgo varias opciones de mitigación con diferentes niveles de complejidad —tales como la generación de un enfoque de sistemas (ES) o inspección de las exportaciones— debe priorizarse esta última, la cual demuestre su eficacia en la reducción del riesgo, sin necesidad de aplicar más medidas u otras más complejas y costosas. <i>Category : SUBSTANTIVE</i>
484	369	<i>Dysmicoccus</i> bispinosus <i>texensis</i>	P	 Brazil Japan

				D. bispinosus is now considered a synonym of D. texensis. Scalenet: https://scalenet.info/catalogue/Dysmicoccus%20bispinosus/ <i>Category : TECHNICAL</i>
485	370	Field and export Export inspection†	P	Colombia Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources. <i>Category : SUBSTANTIVE</i>
486	370	Inspección de campo y de las exportaciones†	P	Colombia La inspección en campo con fines de certificación fitosanitaria en campo no es sostenible de acuerdo a los recursos logísticos, humanos, operáticos y financieros <i>Category : SUBSTANTIVE</i>
487	372	Export inspection; SA 3	P	Colombia The inclusion of the systems approach measure does not correspond to the real level of risk, since there is no prior technical-scientific analysis to support its need or proportion. It is essential to keep in mind, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself. When several mitigation options with different levels of complexity are presented for the same level of risk—such as the generation of a systems approach (SE) or export inspection—priority should be given to the latter, which demonstrates its effectiveness in reducing risk, without the need to apply more or more complex and costly measures. <i>Category : SUBSTANTIVE</i>
488	372	Export inspection; *inspection* ; SA 3	P	EPPO See comment for paragraph 322. <i>Category : EDITORIAL</i>
489	372	Inspección de las exportaciones*; ES 3	P	Colombia La inclusión de la medida de enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental tener en cuenta, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo

				<p>de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF.</p> <p>Cuando para un mismo nivel de riesgo se presentan varias opciones de mitigación con diferentes niveles de complejidad — tales como la generación de un enfoque de sistemas (ES) o inspección de las exportaciones— debe priorizarse esta última, la cual demuestre su eficacia en la reducción del riesgo, sin necesidad de aplicar más medidas u otras más complejas y costosas.</p> <p><i>Category : SUBSTANTIVE</i></p>
490	374	SA-3	P	<p>Colombia</p> <p>The inclusion of the systems approach measure does not correspond to the real level of risk, since there is no prior technical-scientific analysis to support its need or proportion. It is essential to keep in mind, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself.</p> <p><i>Category : SUBSTANTIVE</i></p>
491	374	ES-3	P	<p>Colombia</p> <p>La inclusión de la medida de enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental tener en cuenta, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF.</p> <p><i>Category : SUBSTANTIVE</i></p>
492	376	Export inspection; *IRDN-6 ; SA-3	P	<p>Colombia</p> <p>In accordance with the principles of necessity, minimum impact and risk management established in the International Standard for Phytosanitary Measures (ISPM) No. 1, "Phytosanitary Principles for</p>

			<p>the Protection of Plants and the Application of Phytosanitary Measures in International Trade", when determining pest mitigation measures, the least restrictive alternative that guarantees an adequate level of phytosanitary protection should be chosen.</p> <p>In this sense, when several mitigation options with different levels of complexity are presented—such as the implementation of quarantine treatments (irradiation), generation of a systems approach (SE), or the use of export inspection—the latter should be prioritized, which demonstrates its effectiveness in reducing risk, without the need to apply more or more complex and costly measures.</p> <p>The requirement for highly restrictive measures, such as quarantine treatments or systems approaches, without additional technical justification when export inspection already adequately mitigates the risk, represents an unnecessary burden. These measures generate significant financial, logistical and operational costs for National Plant Protection Organizations (NPPOs), producers and exporters of the exporting country, affecting the competitiveness of the sector without proportionally increasing phytosanitary protection.</p> <p>Including measures such as the requirement for systems approaches, quarantine treatments and export inspection as equivalent options in the same IPPC document leads importing countries to interpret them all as having the same level of applicability. However, in practice, these measures differ significantly in terms of technical complexity, operating costs and resource availability. This perception of equivalence can put unnecessary pressure on countries, prompting them to implement measures that are more complex or costly than necessary, even when there are more proportionate and risk-effective alternatives. In addition, quarantine irradiation treatments should not be established without having previously carried out tests that demonstrate that such treatment does not affect the organoleptic quality or physical characteristics of the fruit. It is essential to ensure that the application of these treatments maintains the integrity of the product, ensuring its commercial acceptance. The implementation of phytosanitary measures must be based on scientific evidence that supports their efficacy without compromising the quality of the product.</p> <p>The inclusion of measures such as systems approach and quarantine treatments do not correspond to the real level of risk, since there is no evidence of a prior technical-scientific analysis to support their need or proportion. It is essential to keep in mind, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous validation, the IPPC risks</p>
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				<p>promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself.</p> <p><i>Category : SUBSTANTIVE</i></p>
493	376	Export inspection;* IRDN 6 ; SA 3	C	<p>EPPO</p> <p>The SA3 reference in table 5 does not cover Dysmicoccus neobrevipes</p> <p><i>Category : SUBSTANTIVE</i></p>
494	376	Export inspection ; inspection *; IRDN 6 ; SA 3	P	<p>EPPO</p> <p>See comment for paragraph 322.</p> <p><i>Category : EDITORIAL</i></p>
495	376	Inspección de las exportaciones*; IRDN 6 ; ES 3	P	<p>Colombia</p> <p>De acuerdo con los principios de necesidad, mínimo impacto y gestión del riesgo establecidos en la Norma Internacional para Medidas Fitosanitarias (NIMF) No. 1, "Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional", al determinar medidas de mitigación de plagas se debe optar por la alternativa menos restrictiva que garantice un nivel adecuado de protección fitosanitaria.</p> <p>En este sentido, cuando se presentan varias opciones de mitigación con diferentes niveles de complejidad —tales como la implementación de tratamientos cuarentenarios (irradiación), generación de un enfoque de sistemas (ES) o el uso inspección de las exportaciones— debe priorizarse esta última, la cual demuestre su eficacia en la reducción del riesgo, sin necesidad de aplicar más medidas u otras más complejas y costosas.</p> <p>El requerimiento de medidas altamente restrictivas, como tratamientos cuarentenarios o enfoques de sistemas, sin justificación técnica adicional cuando la inspección de las exportaciones ya mitiga adecuadamente el riesgo, representa una carga innecesaria. Estas medidas generan costos financieros, logísticos y operativos significativos para las Organizaciones Nacionales de Protección Fitosanitaria (ONPF), los productores y exportadores del país exportador, afectando la competitividad del sector sin incrementar proporcionalmente la protección fitosanitaria.</p> <p>Incluir en un mismo documento de la CIPF medidas como el requisito de enfoques de sistemas, tratamientos cuarentenarios e inspección de exportación como opciones equivalentes conlleva a los países importadores a interpretar que todas tienen el mismo nivel de aplicabilidad. Sin embargo, en la práctica, estas medidas difieren significativamente en términos de complejidad técnica, costos operativos y disponibilidad de recursos. Esta percepción de equivalencia puede generar presión innecesaria sobre los países, impulsándolos a implementar medidas más complejas o costosas</p>

				<p>de lo necesario, aun cuando existan alternativas más proporcionales y eficaces en función del riesgo. Adicional, no se deben establecer tratamientos cuarentenarios de irradiación sin haber realizado previamente pruebas que demuestren que dicho tratamiento no afecta la calidad organoléptica ni las características físicas de la fruta. Es fundamental garantizar que la aplicación de estos tratamientos mantenga la integridad del producto, asegurando su aceptación comercial. La implementación de medidas fitosanitarias debe basarse en evidencia científica que respalde su eficacia sin comprometer la calidad del producto.</p> <p>La inclusión de medidas como enfoque de sistemas y tratamientos cuarentenarios no corresponden con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental tener en cuenta, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF.</p> <p><i>Category : SUBSTANTIVE</i></p>
496	379	<i>Hemiberlesia cyanophylli</i>	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1</p> <p><i>Category : TECHNICAL</i></p>
497	380	Export inspection*	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1</p> <p><i>Category : TECHNICAL</i></p>
498	381	<i>Hemiberlesia lataniae</i>	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1</p> <p><i>Category : TECHNICAL</i></p>
499	382	SA-3	P	<p>Colombia</p> <p>The inclusion of the systems approach measure does not correspond to the real level of risk, since there is no prior technical-scientific analysis to support its need or proportion. It is essential to remember that, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous</p>

				technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself. <i>Category : SUBSTANTIVE</i>
500	382	SA 3	C	EPPO The SA3 reference in table 5 does not cover Hemiberlesia lataniae <i>Category : SUBSTANTIVE</i>
501	382	SA 3	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
502	382	ES 3	P	Colombia La inclusión de la medida de enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental recordar que, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF. <i>Category : SUBSTANTIVE</i>
503	383	Hemiberlesia palmarum	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
504	384	Export inspection*	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
505	386	Export inspection; + PFA	P	Colombia The inclusion of the ALP measure does not correspond to the real level of risk, since there is no evidence of a prior technical-scientific analysis to support its need or proportion. It is essential to remember that, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound

				scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself. <i>Category : SUBSTANTIVE</i>
506	386	Export inspection inspection*; PFA	P	EPPO See comment for paragraph 322. <i>Category : EDITORIAL</i>
507	386	Export inspection;* PFA	C	United States of America Add IRDN 7 as a measure <i>Category : TECHNICAL</i>
508	386	Inspección de las exportaciones*; ALP	P	Colombia La inclusión de la medida de ALP no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental recordar que, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF. <i>Category : SUBSTANTIVE</i>
509	387	Nipaecoccus nipae	C	United States of America Add new row: Paracoccus marginatus **; Export inspection; PFA; SA 1 ** No ISPM 28 phytosanitary treatment (PT) adopted for these two species. Irradiation may be considered by equivalence to PT 19 (Dysmicoccus neobrevipes, Planococcus lilacinus, Planococcus minor) only if it is accepted by the importing NPPO. <i>Category : TECHNICAL</i>
510	389	Pinnaspis musae	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
511	390	Export inspection*	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
512	392	IRDN 6; SA 3 Export Inspection	P	Colombia The inclusion of phytosanitary treatment measures with irradiation and systems approach does not correspond to the real level of

				<p>risk, since there is no evidence of a prior technical-scientific analysis to support their need or proportion. It is essential to remember that, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself.</p> <p><i>Category : SUBSTANTIVE</i></p>
513	392	IRDN 6; ES 3 <u>Inspección de las exportaciones.</u>	P	<p>Colombia</p> <p>La inclusión de las medidas de tratamiento fitosanitario con irradiación y enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental recordar que, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF.</p> <p><i>Category : SUBSTANTIVE</i></p>
514	394	Export inspection; IRDN 6; SA 3	P	<p>Colombia</p> <p>The inclusion of phytosanitary irradiation treatment and systems approach does not correspond to the real level of risk, since there is no evidence of a prior technical-scientific analysis to support its need or proportion. It is essential to remember that, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself.</p> <p><i>Category : SUBSTANTIVE</i></p>
515	394	Export inspection ; <u>inspection</u> ; IRDN 6; SA 3	P	<p>EPPO</p> <p>See comment for paragraph 322.</p>


				<i>Category : EDITORIAL</i>
516	394	Inspección de las exportaciones*; IRDN 6 ; ES 3	P	<p>Colombia</p> <p>La inclusión de tratamiento fitosanitario de irradiación y enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental recordar que, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF.</p> <p><i>Category : SUBSTANTIVE</i></p>
517	397	<i>Pseudococcus elisae</i>	C	<p>United States of America</p> <p>Add new row: Pseudococcus cryptus **; Export inspection; PFA; SA 1</p> <p>See ** in comment for para 387</p> <p><i>Category : TECHNICAL</i></p>
518	400	Export inspection;* IRDN 5 ; SA 3	P	<p>Colombia</p> <p>The inclusion of phytosanitary irradiation treatment and systems approach does not correspond to the real level of risk, since there is no evidence of a prior technical-scientific analysis to support its need or proportion. It is essential to remember that, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself.</p> <p><i>Category : SUBSTANTIVE</i></p>
519	400	Export inspection;* IRDN 5; SA 3	C	<p>EPPO</p> <p>The SA3 reference in table 5 does not cover Psuedococcus jackbeardsleyi</p> <p><i>Category : SUBSTANTIVE</i></p>
520	400	Export inspection ; <i>*inspection*</i> ; IRDN 5; SA 3	P	<p>EPPO</p> <p>See comment for paragraph 322.</p> <p><i>Category : EDITORIAL</i></p>


521	400	Inspección de las exportaciones*; IRDN-5; ES-3	P	Colombia La inclusión de tratamiento fitosanitario de irradiación y enfoque de sistemas no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental recordar que, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF. <i>Category : SUBSTANTIVE</i>
522	401	Selenaspidus articulatus	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
523	402	Export inspection*	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
524	403	Whiteflies	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
525	405	Aleurocanthus woglumi	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
526	406	PFA-Export inspection	P	Colombia The inclusion of ALP does not correspond to the real level of risk, since there is no evidence of a prior technical-scientific analysis to support its need or proportion. It is essential to remember that, although it is indicated that countries must carry out their own risk assessment, when a measure is presented within an ISPM, importing countries assume it as a valid and reliable technical reference. In the absence of rigorous technical validation, the IPPC risks promoting phytosanitary requirements that become circular and mandatory in practice, without a sound scientific justification. This leads to the imposition of disproportionate requirements that affect international trade, contravening the principles of necessity, proportionality and technical justification established by the IPPC itself. <i>Category : SUBSTANTIVE</i>

527	406	PFA	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
528	406	ALP Inspección de las exportaciones*	P	Colombia La inclusión ALP no corresponde con el nivel real de riesgo, ya que no se evidencia un análisis técnico-científico previo que respalde su necesidad o proporción. Es fundamental recordar que, aunque se indique que los países deben realizar su propia evaluación de riesgo, cuando una medida es presentada dentro de una NIMF, los países importadores la asumen como una referencia técnica válida y confiable. En ausencia de una validación técnica rigurosa, la CIPF corre el riesgo de promover requisitos fitosanitarios que se vuelven circulares y obligatorios en la práctica, sin contar con una justificación científica sólida. Esto conlleva a la imposición de exigencias desproporcionadas que afectan el comercio internacional, contraviniendo los principios de necesidad, proporcionalidad y fundamentación técnica establecidos por la propia CIPF. <i>Category : SUBSTANTIVE</i>
529	407	Aleurodictus dispersus	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
530	408	Field and export Export inspection†	P	Colombia Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources <i>Category : SUBSTANTIVE</i>
531	408	Field and export inspection†	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
532	408	Inspección de campo y de las exportaciones†	P	Colombia La inspección en campo con fines de certificación fitosanitaria en campo no es sostenible de acuerdo a los recursos logísticos, humanos, operáticos y financieros. <i>Category : SUBSTANTIVE</i>
533	409	Aleurodictus floccissimus	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
534	410	Export inspection*	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>


535	411	Moths	C	United States of America New Pest group and Pest species Beetles Cosmopolites sordidus; Export inspection; PFA; SA 1 Brazil Do you mean that USA requires these measures when regulating Cosmopolites sordidus in international Musa fruit trade? <i>Category : TECHNICAL</i>
536	411	Moths	C	United States of America Add new row Erionota thrax; Export inspection; PFA; SA 1 Brazil Do you mean that USA requires these measures when regulating Erionota thrax in international Musa fruit trade? <i>Category : TECHNICAL</i>
537	411	Hétérocères	C	IPPC Regional Workshop Africa ce groupes d'organismes nuisbles ne figurent pas dans le tableau 1, car il est dit dans la section 4 "mesures phytosanitaires à envisager", au 3è paragraphe: "Le tableau 3 présente des options spécifiques pour gérer les risques phytosanitaires relatifs à des organismes nuisibles recensés dans le tableau 1" <i>Category : TECHNICAL</i>
538	416	Field and export <u>Export</u> inspection†	P	Colombia Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources <i>Category : SUBSTANTIVE</i>
539	416	Inspección de campo y de las exportaciones †	P	Colombia Teniendo en cuenta que no se encontraron reportes científicos de que Oiketicus kirbyi siga la vía de ingreso, se debe eliminar la medida fitosanitaria <i>Category : SUBSTANTIVE</i>
540	420	Field and export <u>Export</u> inspection†	P	Colombia Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources. <i>Category : SUBSTANTIVE</i>
541	420	Inspección de campo y de las exportaciones†	P	Colombia La inspección en campo con fines de certificación fitosanitaria en campo no es sostenible de acuerdo a los recursos logísticos, humanos, operáticos y financieros. <i>Category : SUBSTANTIVE</i>
542	421	Spodoptera eridania	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
543	422	Field and export <u>Export</u> inspection†	P	Colombia

				Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources. <i>Category : SUBSTANTIVE</i>
544	422	Field and export inspection [†]	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
545	422	Inspección de campo y de las exportaciones [†]	P	Colombia La inspección en campo con fines de certificación fitosanitaria en campo no es sostenible de acuerdo a los recursos logísticos, humanos, operáticos y financieros. <i>Category : SUBSTANTIVE</i>
546	423	Spodoptera frugiperda	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
547	424	Field and export inspection [†]	P	Colombia Taking into account that no scientific reports were found that Spodoptera frugiperda follows the entry route, the phytosanitary measure should be eliminated. <i>Category : SUBSTANTIVE</i>
548	424	Field and export <u>Export</u> inspection [†]	P	Colombia Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources. <i>Category : SUBSTANTIVE</i>
549	424	Field and export inspection [†]	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i>
550	424	Inspección de campo y de las exportaciones [†]	P	Colombia Teniendo en cuenta que no se encontraron reportes científicos de que Spodoptera frugiperda siga la vía de ingreso, se debería eliminar la medida fitosanitaria. <i>Category : SUBSTANTIVE</i>
551	428	Export inspection*	C	United States of America Add PFA; SA 1 as options for phytosanitary measures <i>Category : TECHNICAL</i>
552	439	Thrips palmi	P	Colombia A review of technical and scientific information was carried out and no reliable sources were found to validate that this insect affects fresh fruit of Musa spp. <i>Category : SUBSTANTIVE</i>
553	439	Thrips palmi	P	Colombia Se realizó revisión de información técnica y científica y no se


				encontraron fuentes confiables que valide que este insecto afecta fruta fresca de Musa spp. <i>Category : SUBSTANTIVE</i>
554	440	Export inspection*	P	Colombia A review of technical and scientific information was carried out and no reliable sources were found to validate that this insect affects fresh fruit of Musa spp. <i>Category : SUBSTANTIVE</i>
555	440	Inspección de las exportaciones*	P	Colombia Teniendo en cuenta que la plaga no afecta Musa spp. no se deben exigir medidas de mitigación. <i>Category : SUBSTANTIVE</i>
556	441	Snails	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
557	443	Lissachatina fulica	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
558	444	Export inspection*	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
559	445	Succinea spp.	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
560	446	Export inspection*	P	Japan Refer to general comments and comments for paragraph No 228. <i>Category : SUBSTANTIVE</i>
561	449	Ceratocystis paradoxa	P	 Brazil Colombia The application of measures such as field or export inspection for fungi such as Ceratocystis paradoxa in immature bunches of bananas destined for export lacks technical and scientific justification, because in this physiological state the fruit has high firmness, intact epidermis and natural defenses that limit the penetration and active development of the pest. which expresses symptoms in advanced maturation stages (Moraes and Ploetz, 2010). In accordance with the principles of the International Plant Protection Convention and the International Standards for Phytosanitary Measures ISPM 2 and ISPM 11, phytosanitary measures should not be imposed for non-quarantine pests when the risk of establishment and the potential economic impact are minimal, as this would contravene the principle of proportionality and could lead to unnecessary costs with no real benefits in plant protection (IPPC, 2019a; 2019b). Moraes, W. S., & Ploetz, R. C. (2010). Crown rot of bananas: The causal agents and control methods. Plant Disease, 94(6), 648–654. https://apsjournals.apsnet.org/doi/pdf/10.1094/pdis-94-6-0648

				International Plant Protection Convention. (2019a). ISPM 2: Framework for pest risk analysis. FAO. https://www.ippc.int/en/publications/622/ International Plant Protection Convention. (2019b). ISPM 11: Pest risk analysis for quarantine pests. FAO. https://www.ippc.int/en/publications/639/ <i>Category : SUBSTANTIVE</i>
562	449	<i>Ceratocystis paradoxa</i>	P	Colombia La aplicación de medidas como la inspección de campo o de exportación para hongos como <i>Ceratocystis paradoxa</i> en racimos inmaduros de banano destinados a exportación carece de justificación técnica y científica, debido a que en este estado fisiológico el fruto presenta alta firmeza, epidermis intacta y defensas naturales que limitan la penetración y el desarrollo activo de la plaga, la cual expresa síntomas en estados de maduración avanzada (Moraes and Ploetz, 2010). De acuerdo con los principios de la Convención Internacional de Protección Fitosanitaria y las Normas Internacionales para Medidas Fitosanitarias NIMF 2 y NIMF 11, no se deben imponer medidas fitosanitarias para plagas no cuarentenarias cuando el riesgo de establecimiento y el impacto económico potencial son mínimos, ya que esto contravendría el principio de proporcionalidad y podría generar costos innecesarios sin beneficios reales en protección vegetal (IPPC, 2019a; 2019b). Moraes, W. S., & Ploetz, R. C. (2010). Crown rot of bananas: The causal agents and control methods. Plant Disease, 94(6), 648–654. https://apsjournals.apsnet.org/doi/pdf/10.1094/pdis-94-6-0648 International Plant Protection Convention. (2019a). ISPM 2: Framework for pest risk analysis. FAO. https://www.ippc.int/en/publications/622/ International Plant Protection Convention. (2019b). ISPM 11: Pest risk analysis for quarantine pests. FAO. https://www.ippc.int/en/publications/639/ <i>Category : SUBSTANTIVE</i>
563	450	<i>Field and export inspection</i> * <i>Export inspection</i>	P	Colombia Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources <i>Category : EDITORIAL</i>
564	450	Inspección de <i>campo y de</i> las exportaciones†	P	Colombia La inspección en campo con fines de certificación fitosanitaria en campo no es sostenible de acuerdo a los recursos logísticos, humanos, operáticos y financieros <i>Category : SUBSTANTIVE</i>
565	451	<i>Colletotrichum musae</i>	P	 Brazil Colombia

				<p>The application of measures such as field or export inspection for fungi such as <i>Colletotrichum musae</i> in immature bunches of bananas destined for export lacks technical and scientific justification, because in this physiological state the fruit has high firmness, intact epidermis and natural defenses that limit the penetration and active development of the pest. which expresses symptoms in advanced maturation stages (Moraes and Ploetz, 2010). In accordance with the principles of the International Plant Protection Convention and the International Standards for Phytosanitary Measures ISPM 2 and ISPM 11, phytosanitary measures should not be imposed for non-quarantine pests when the risk of establishment and the potential economic impact are minimal, as this would contravene the principle of proportionality and could lead to unnecessary costs with no real benefits in plant protection (IPPC, 2019a; 2019b).</p> <p>Moraes, W. S., & Ploetz, R. C. (2010). Crown rot of bananas: The causal agents and control methods. <i>Plant Disease</i>, 94(6), 648–654. https://apsjournals.apsnet.org/doi/pdf/10.1094/pdis-94-6-0648</p> <p><i>Category : SUBSTANTIVE</i></p>
566	451	<i>Colletotrichum musae</i>	P	<p>Colombia</p> <p>La aplicación de medidas como la inspección de campo o de exportación para hongos como <i>Colletotrichum musae</i> en racimos inmaduros de banano destinados a exportación carece de justificación técnica y científica, debido a que en este estado fisiológico el fruto presenta alta firmeza, epidermis intacta y defensas naturales que limitan la penetración y el desarrollo activo de la plaga, la cual expresa síntomas en estados de maduración avanzada (Moraes and Ploetz, 2010). De acuerdo con los principios de la Convención Internacional de Protección Fitosanitaria y las Normas Internacionales para Medidas Fitosanitarias NIMF 2 y NIMF 11, no se deben imponer medidas fitosanitarias para plagas no cuarentenarias cuando el riesgo de establecimiento y el impacto económico potencial son mínimos, ya que esto contravendría el principio de proporcionalidad y podría generar costos innecesarios sin beneficios reales en protección vegetal (IPPC, 2019a; 2019b).</p> <p>Moraes, W. S., & Ploetz, R. C. (2010). Crown rot of bananas: The causal agents and control methods. <i>Plant Disease</i>, 94(6), 648–654. https://apsjournals.apsnet.org/doi/pdf/10.1094/pdis-94-6-0648</p> <p><i>Category : SUBSTANTIVE</i></p>
567	452	Field and export Export inspection†	P	<p>Colombia</p> <p>Field inspection for phytosanitary certification purposes in the field is not sustainable according to logistical, human, operational and financial resources</p> <p><i>Category : EDITORIAL</i></p>
568	452	Inspección de campo y de las exportaciones†	P	<p>Colombia</p> <p>La inspección en campo con fines de certificación fitosanitaria en</p>



			campo no es sostenible de acuerdo a los recursos logísticos, humanos, operáticos y financieros <i>Category : SUBSTANTIVE</i>
569	453	<i>Fusarium oxysporum f.sp. cubense TR4</i>	<p>P</p> <p> Brazil</p> <p>Colombia</p> <p>Regarding the inclusion of <i>Fusarium oxysporum</i> f.sp. Tropical Race 4 (Foc TR4), in Table 1 and the mention that the appropriate mitigation measures for this pathogen are free areas or free production sites (Table 3), respectfully expresses concern about the erroneous message that is being spread. The above, taking into account that research carried out by the Plant Biosecurity Laboratory of the Australian Department of Agriculture, Fisheries and Forestry (DAFF), in which 451 tissue samples of Cavendish banana fruit from plants infected with Foc TR4 were analyzed, it was concluded that this pathogen does not infect the fruit (DAFF, 2018). Additional studies confirm that even in advanced stages of the disease, the fruit remains free of Foc TR4 infection (Daly & Walduck, 2006; Dita et al., 2010).</p> <p>The incorporation of this pest as associated with fresh fruit of <i>Musa</i> spp. for human consumption constitutes an unjustified measure that imposes disproportionate restrictions on international trade, with significant social and economic impacts for producing countries. This measure compromises the competitiveness of the sector, generates uncertainty in the markets and puts at risk thousands of direct and indirect jobs linked to this production chain.</p> <p>The report of the Standards Committee held from 12 to 16 May 2025, in Rome, Italy, states that "Some SC members expressed doubt about whether <i>Musa</i> fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of <i>Musa</i> to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending consultation comments". However, it is considered that disseminating this information worldwide without prior validation is an unwise practice, which generates confusion and misinformation, thus promoting unjustified measures by importing countries and the use of scarce resources to implement actions that are not required or, failing that, making exports unviable. While recognizing the sovereign right of</p>


				<p>countries to establish phytosanitary measures to protect plant health, this right should be exercised on the basis of scientific criteria and without creating unnecessary obstacles to international trade.</p> <p>Therefore, and in accordance with the principles established in ISPM No. 1, it is categorically requested not to disseminate information contrary to the existing scientific evidence, which demonstrates that Foc TR4 does not affect the fresh fruit of Musa spp., and requiring this type of phytosanitary measures for this pest constitutes a barrier to trade, lacking scientific justification and contrary to the principles of the IPPC.</p> <p>Daly, A & Walduck, G. 2006. Fusarium wilt of banana (Panama disease). Agnote. 151(5). Dita, M. A., Waalwijk, C., Buddenhagen, I. W., Souza Jr, M. T. & Kema, G. H. J. 2010. A molecular diagnostic for tropical race 4 of the banana fusarium wilt pathogen. Plant Pathology. 59 (2). 348-357. <i>Category : SUBSTANTIVE</i></p>
570	453	Fusarium oxysporum f.sp. cubense TR4	P	<p>Japan Refer to general comments and comments for paragraph No 249. <i>Category : SUBSTANTIVE</i></p>
571	453	Fusarium oxysporum f.sp. cubense TR4	P	<p>COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 <i>Category : TECHNICAL</i></p>
572	453	Fusarium oxysporum f. sp. cubense R4T	P	<p>Colombia Respecto a la inclusión de Fusarium oxysporum f.sp. cubense Raza 4 Tropical (Foc R4T), en el cuadro 1 y la mención de que las medidas de mitigación apropiadas para este patógeno son áreas libres o lugares de producción libres (Cuadro 3), respetuosamente se manifiesta la preocupación del mensaje erróneo que se está difundiendo. Lo anterior, teniendo en cuenta que investigaciones realizadas por el Laboratorio de Bioseguridad Vegetal del Departamento de Agricultura, Pesca y Silvicultura de Australia (DAFF, por su sigla en inglés), en las que se analizaron 451 muestras de tejido de fruto de banano Cavendish provenientes de plantas infectadas con Foc R4T, se concluyó que este patógeno no infecta el fruto (DAFF, 2018). Estudios adicionales confirman que incluso, en estados avanzados de la enfermedad, el fruto permanece libre de infección por Foc R4T (Daly & Walduck, 2006; Dita et al., 2010). La incorporación de esta plaga como asociada a la fruta fresca de Musa spp. para consumo humano constituye una medida injustificada que impone restricciones desproporcionadas al comercio internacional, con impactos sociales y económicos significativos para los países productores. Esta medida compromete la competitividad del sector, genera incertidumbre en</p>


			<p>los mercados y pone en riesgo miles de empleos directos e indirectos vinculados a esta cadena productiva.</p> <p>El informe del Comité de Normas celebrado del 12 al 16 de mayo de 2025, en Roma, Italia, indica que "Some SC members expressed doubt about whether Musa fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of Musa to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending consultation comments". No obstante, se considera que difundir esta información a nivel mundial sin una previa validación es una práctica no acertada, que genera confusiones y desinformación, promoviendo así medidas injustificadas por parte de países importadores y la utilización de los escasos recursos en implementar acciones que no se requieren o en su defecto haciendo las exportaciones inviables. Si bien se reconoce el derecho soberano de los países a establecer medidas fitosanitarias para proteger la sanidad vegetal, dicho derecho debe ejercerse sobre la base de criterios científicos y sin constituir obstáculos innecesarios al comercio internacional.</p> <p>Por lo tanto, y en concordancia con los principios establecidos en la NIMF No. 1, se solicita de manera categórica no difundir información contraria a la evidencia científica existente, la cual demuestra que Foc R4T no afecta el fruto fresco de Musa spp., y requerir este tipo de medidas fitosanitarias para esta plaga constituye una barrera al comercio, carente de justificación científica y contraria a los principios de la CIPF.</p> <p>Daly, A & Walduck, G. 2006. Fusarium wilt of banana (Panama disease). Agnote. 151(5). Dita, M. A., Waalwijk, C., Buddenhagen, I. W., Souza Jr, M. T. & Kema, G. H. J. 2010. A molecular diagnostic for tropical race 4 of the banana fusarium wilt pathogen. Plant Pathology. 59 (2). 348-357. <i>Category : SUBSTANTIVE</i></p>
573	454	PFA; PFPP	<p>P  Brazil Colombia Regarding the inclusion of Fusarium oxysporum f.sp. Tropical Race</p>


			<p>4 (Foc TR4), in Table 1 and the mention that the appropriate mitigation measures for this pathogen are free areas or free production sites (Table 3), respectfully expresses concern about the erroneous message that is being spread. The above, taking into account that research carried out by the Plant Biosecurity Laboratory of the Australian Department of Agriculture, Fisheries and Forestry (DAFF), in which 451 tissue samples of Cavendish banana fruit from plants infected with Foc TR4 were analyzed, it was concluded that this pathogen does not infect the fruit (DAFF, 2018). Additional studies confirm that even in advanced stages of the disease, the fruit remains free of Foc TR4 infection (Daly & Walduck, 2006; Dita et al., 2010).</p> <p>The incorporation of this pest as associated with fresh fruit of Musa spp. for human consumption constitutes an unjustified measure that imposes disproportionate restrictions on international trade, with significant social and economic impacts for producing countries. This measure compromises the competitiveness of the sector, generates uncertainty in the markets and puts at risk thousands of direct and indirect jobs linked to this production chain.</p> <p>The report of the Standards Committee held from 12 to 16 May 2025, in Rome, Italy, states that "Some SC members expressed doubt about whether Musa fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of Musa to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending consultation comments". However, it is considered that disseminating this information worldwide without prior validation is an unwise practice, which generates confusion and misinformation, thus promoting unjustified measures by importing countries and the use of scarce resources to implement actions that are not required or, failing that, making exports unviable. While recognizing the sovereign right of countries to establish phytosanitary measures to protect plant health, this right should be exercised on the basis of scientific criteria and without creating unnecessary obstacles to international trade.</p> <p>Therefore, and in accordance with the principles established in ISPM No. 1, it is categorically requested not to disseminate information contrary to the existing scientific evidence, which</p>
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				<p>demonstrates that Foc TR4 does not affect the fresh fruit of Musa spp., and requiring this type of phytosanitary measures for this pest constitutes a barrier to trade, lacking scientific justification and contrary to the principles of the IPPC.</p> <p>Daly, A & Walduck, G. 2006. Fusarium wilt of banana (Panama disease). Agnote. 151(5). Dita, M. A., Waalwijk, C., Buddenhagen, I. W., Souza Jr, M. T. & Kema, G. H. J. 2010. A molecular diagnostic for tropical race 4 of the banana fusarium wilt pathogen. Plant Pathology. 59 (2). 348-357. Category : <i>SUBSTANTIVE</i></p>
574	454	PFA; PFPP	P	<p>Japan Refer to general comments and comments for paragraph No 249. Category : <i>SUBSTANTIVE</i></p>
575	454	PFA; PFPP	C	<p>EPPO There should be an explanation, justification, reference, and/or methodology for this and other mentions of PFPP in the pest specific options table. Without this information, there is no need to include it in the pest specific options table, as it is already covered in the general options table 2 (paragraph 274). See comment on paragraph 310 for more detail. Category : <i>SUBSTANTIVE</i></p>
576	454	PFA; PFPP	P	<p>COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1 Category : <i>TECHNICAL</i></p>
577	454	ALP; LPLP	P	<p>Colombia Respecto a la inclusión de Fusarium oxysporum f.sp. cubense Raza 4 Tropical (Foc R4T), en el cuadro 1 y la mención de que las medidas de mitigación apropiadas para este patógeno son áreas libres o lugares de producción libres (Cuadro 3), respetuosamente se manifiesta la preocupación del mensaje erróneo que se está difundiendo. Lo anterior, teniendo en cuenta que investigaciones realizadas por el Laboratorio de Bioseguridad Vegetal del Departamento de Agricultura, Pesca y Silvicultura de Australia (DAFF, por su sigla en inglés), en las que se analizaron 451 muestras de tejido de fruto de banano Cavendish provenientes de plantas infectadas con Foc R4T, se concluyó que este patógeno no infecta el fruto (DAFF, 2018). Estudios adicionales confirman que incluso, en estados avanzados de la enfermedad, el fruto permanece libre de infección por Foc R4T (Daly & Walduck, 2006; Dita et al., 2010). La incorporación de esta plaga como asociada a la fruta fresca de Musa spp. para consumo humano constituye una medida injustificada que impone restricciones desproporcionadas al comercio internacional, con impactos sociales y económicos</p>

			<p>significativos para los países productores. Esta medida compromete la competitividad del sector, genera incertidumbre en los mercados y pone en riesgo miles de empleos directos e indirectos vinculados a esta cadena productiva.</p> <p>El informe del Comité de Normas celebrado del 12 al 16 de mayo de 2025, en Roma, Italia, indica que "Some SC members expressed doubt about whether Musa fruit is a pathway for TR4, as TR4 does not present symptoms on the fruit, and suggested that TR4 could therefore be considered a contaminating pest. The SC noted, however, that one country required imports of Musa to come from a pest free area (PFA) or a pest free place of production, which implied that there was a concern that the fruit is a pathway. The SC chairperson clarified that it was not possible for the TPCS, or even the CPM, to question the importing country about their risk analysis, as one of the underlying principles of ISPM 46 was that commodity standards do not affect the sovereign right of countries to prescribe phytosanitary measures. The SC therefore retained the pest on the list, pending consultation comments". No obstante, se considera que difundir esta información a nivel mundial sin una previa validación es una práctica no acertada, que genera confusiones y desinformación, promoviendo así medidas injustificadas por parte de países importadores y la utilización de los escasos recursos en implementar acciones que no se requieren o en su defecto haciendo las exportaciones inviables. Si bien se reconoce el derecho soberano de los países a establecer medidas fitosanitarias para proteger la sanidad vegetal, dicho derecho debe ejercerse sobre la base de criterios científicos y sin constituir obstáculos innecesarios al comercio internacional.</p> <p>Por lo tanto, y en concordancia con los principios establecidos en la NIMF No. 1, se solicita de manera categórica no difundir información contraria a la evidencia científica existente, la cual demuestra que Foc R4T no afecta el fruto fresco de Musa spp., y requerir este tipo de medidas fitosanitarias para esta plaga constituye una barrera al comercio, carente de justificación científica y contraria a los principios de la CIPF.</p> <p>Daly, A & Walduck, G. 2006. Fusarium wilt of banana (Panama disease). Agnote. 151(5). Dita, M. A., Waalwijk, C., Buddenhagen, I. W., Souza Jr, M. T. & Kema, G. H. J. 2010. A molecular diagnostic for tropical race 4 of the banana fusarium wilt pathogen. Plant Pathology. 59 (2). 348-357. Category : <i>SUBSTANTIVE</i></p>
578	455	<i>Pseudocercospora fijiensis</i>	<p>P</p> <p> Brazil  Colombia</p>

			<p>The biology of the fungus <i>Pseudocercospora fijiensis</i>, the causative agent of black Sigatoka, is strictly associated with the leaf tissue of banana plants. Its life cycle, according to epidemiological research, includes germination of conidia and ascospores on the surface of young leaves, penetration through stomata, colonization of the mesophyll by intercellular growth and appearance of necrotic lesions; there is no evidence that this pathogen colonizes the fruits or structures of the cluster (CHURCHILL, 2011).</p> <p>Mitigation measures should not be established for pests that do not follow the route of entry.</p> <p>CHURCHILL, A.C.L. (2011), <i>Mycosphaerella fijiensis</i>, the black leaf streak pathogen of banana: progress towards understanding pathogen biology and detection, disease development, and the challenges of control. <i>Molecular Plant Pathology</i>, 12: 307-328. https://doi.org/10.1111/j.1364-3703.2010.00672.x</p> <p>Category : SUBSTANTIVE</p>
579	455	<i>Pseudocercospora fijiensis</i>	<p>P Colombia</p> <p>La biología del hongo <i>Pseudocercospora fijiensis</i>, agente causal de la Sigatoka negra, está estrictamente asociada al tejido foliar de las plantas de banano. Su ciclo de vida, conforme a investigaciones epidemiológicas, incluye germinación de conidios y ascoporas en la superficie de hojas jóvenes, penetración a través de estomas, colonización del mesófilo por crecimiento intercelular y aparición de lesiones necróticas; no hay evidencia de que este patógeno colonice los frutos ni las estructuras del racimo (CHURCHILL, 2011).</p> <p>No se deben establecer medidas de mitigación para plagas que no siguen la vía de ingreso.</p> <p>CHURCHILL, A.C.L. (2011), <i>Mycosphaerella fijiensis</i>, the black leaf streak pathogen of banana: progress towards understanding pathogen biology and detection, disease development, and the challenges of control. <i>Molecular Plant Pathology</i>, 12: 307-328. https://doi.org/10.1111/j.1364-3703.2010.00672.x</p> <p>Category : SUBSTANTIVE</p>
580	456	PFA; SA-3	<p>P  Brazil</p> <p>Colombia</p> <p>The biology of the fungus <i>Pseudocercospora fijiensis</i>, the causative agent of black Sigatoka, is strictly associated with the leaf tissue of banana plants. Its life cycle, according to epidemiological research, includes germination of conidia and ascospores on the surface of young leaves, penetration through stomata, colonization of the mesophyll by intercellular growth and appearance of necrotic lesions; there is no evidence that this pathogen colonizes the fruits or structures of the cluster</p>

				(CHURCHILL, 2011). Mitigation measures should not be established for pests that do not follow the route of entry. CHURCHILL, A.C.L. (2011), Mycosphaerella fijiensis, the black leaf streak pathogen of banana: progress towards understanding pathogen biology and detection, disease development, and the challenges of control. Molecular Plant Pathology, 12: 307-328. https://doi.org/10.1111/j.1364-3703.2010.00672.x <i>Category : SUBSTANTIVE</i>
581	456	PFA ; SA 3	P	COSAVE PFA is a general measure that applies to any pest and is included in Table 2. This is for consistency with Annex 1 of ISPM 46 (mango). <i>Category : TECHNICAL</i>
582	456	ALP ; ES 3	P	Colombia La biología del hongo Pseudocercospora fijiensis, agente causal de la Sigatoka negra, está estrictamente asociada al tejido foliar de las plantas de banano. Su ciclo de vida, conforme a investigaciones epidemiológicas, incluye germinación de conidios y ascosporas en la superficie de hojas jóvenes, penetración a través de estomas, colonización del mesófilo por crecimiento intercelular y aparición de lesiones necróticas; no hay evidencia de que este patógeno colonice los frutos ni las estructuras del racimo (CHURCHILL, 2011). No se deben establecer medidas de mitigación para plagas que no siguen la vía de ingreso. CHURCHILL, A.C.L. (2011), Mycosphaerella fijiensis, the black leaf streak pathogen of banana: progress towards understanding pathogen biology and detection, disease development, and the challenges of control. Molecular Plant Pathology, 12: 307-328. https://doi.org/10.1111/j.1364-3703.2010.00672.x <i>Category : SUBSTANTIVE</i>
583	457	<u>Mycosphaerella musicola</u> <u>fijiensis field</u>	P	Senegal <i>Category : TECHNICAL</i>
584	457	Mycosphaerella musicola	P	 Brazil Colombia The biology of Mycosphaerella musicola is strictly linked to the leaves of banana plants. Its biological cycle includes the germination of conidia and ascospores, penetration through the stomata, the colonization of the mesophyll, and intercellular growth within leaf tissue, without involving the fruit or cluster structures at any time (Gomes et al., 2018). Mitigation measures should not be established for pests that do not follow the route of entry. Gomes, L.I.S., Douhan, G.W., Lehner, M.S., Bibiano, L.B.J. and

				Mizubuti, E.S.G. (2018), Yellow sigatoka epidemics caused by a panmictic population of <i>Mycosphaerella musicola</i> in Brazil. Plant Pathol, 67: 295-302. https://doi.org/10.1111/ppa.12752 <i>Category : SUBSTANTIVE</i>
585	457	<i>Mycosphaerella musicola</i>	P	Japan Refer to general comments and comments for paragraph No 249. <i>Category : SUBSTANTIVE</i>
586	457	<i>Mycosphaerella musicola</i>	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
587	457	<i>Mycosphaerella musicola</i>	P	Colombia La biología de <i>Mycosphaerella musicola</i> esta estrictamente vinculada con las hojas de las plantas de banano. Su ciclo biológico incluye la germinación de conidios y ascosporas, la penetración a través de los estomas, la colonización del mesófilo y el crecimiento intercelular dentro de tejido foliar, sin involucrar en ningún momento el fruto ni estructuras del racimo (Gomes et al., 2018). No se deben establecer medidas de mitigación para plagas que no siguen la vía de ingreso. Gomes, L.I.S., Douhan, G.W., Lehner, M.S., Bibiano, L.B.J. and Mizubuti, E.S.G. (2018), Yellow sigatoka epidemics caused by a panmictic population of <i>Mycosphaerella musicola</i> in Brazil. Plant Pathol, 67: 295-302. https://doi.org/10.1111/ppa.12752 <i>Category : SUBSTANTIVE</i>
588	458	SA-3	P	 Brazil Colombia The biology of <i>Mycosphaerella musicola</i> is strictly linked to the leaves of banana plants. Its biological cycle includes the germination of conidia and ascospores, penetration through the stomata, the colonization of the mesophyll, and intercellular growth within leaf tissue, without involving the fruit or cluster structures at any time (Gomes et al., 2018). Mitigation measures should not be established for pests that do not follow the route of entry. Gomes, L.I.S., Douhan, G.W., Lehner, M.S., Bibiano, L.B.J. and Mizubuti, E.S.G. (2018), Yellow sigatoka epidemics caused by a panmictic population of <i>Mycosphaerella musicola</i> in Brazil. Plant Pathol, 67: 295-302. https://doi.org/10.1111/ppa.12752 <i>Category : SUBSTANTIVE</i>
589	458	SA-3	P	Japan Refer to general comments and comments for paragraph No 249. <i>Category : SUBSTANTIVE</i>
590	458	SA-3	P	COSAVE It is suggested to remove it as a consequence of the removal of

				the pest from Table 1. <i>Category : TECHNICAL</i>
591	458	ES-3	P	<p>Colombia</p> <p>La biología de Mycosphaerella musicola esta estrictamente vinculada con las hojas de las plantas de banano. Su ciclo biológico incluye la germinación de conidios y ascosporas, la penetración a través de los estomas, la colonización del mesófilo y el crecimiento intercelular dentro de tejido foliar, sin involucrar en ningún momento el fruto ni estructuras del racimo (Gomes et al., 2018).</p> <p>No se deben establecer medidas de mitigación para plagas que no siguen la vía de ingreso.</p> <p>Gomes, L.I.S., Douhan, G.W., Lehner, M.S., Bibiano, L.B.J. and Mizubuti, E.S.G. (2018), Yellow sigatoka epidemics caused by a panmictic population of Mycosphaerella musicola in Brazil. Plant Pathol, 67: 295-302. https://doi.org/10.1111/ppa.12752</p> <p><i>Category : SUBSTANTIVE</i></p>
592	461	Bacteria	C	<p>United States of America</p> <p>Add category for Viruses</p> <p>Banana bunchy top virus; Field inspection; Pre-planting control measures (e.g. area of low pest prevalence). Control of aphids. (Reference: Martinez et al., 2023. http://dx.doi.org/10.15517/am.v34i1.49577 https://www.ctahr.hawaii.edu/bbtd/aphid_control.asp</p> <p>CMV and BBrMV; Certificated tissue culture imports/trades</p> <p>Brazil</p> <p>Do you mean that USA regulates viruses in international Musa fruit trade?</p> <p><i>Category : TECHNICAL</i></p>
593	461	Bacteria	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1.</p> <p><i>Category : TECHNICAL</i></p>
594	463	Races and strains of Ralstonia solanacearum that affect Musa spp.	P	<p>Colombia</p> <p>Due to the nature of Ralstonia solanacearum, which causes the death of the plant, there is no commercial or technical feasibility to keep affected plants in production. Therefore, the possibility of infected fruits reaching the point of harvest and subsequent export is nil.</p> <p><i>Category : SUBSTANTIVE</i></p>
595	463	Races and strains of Ralstonia solanacearum that affect Musa spp.	P	<p>COSAVE</p> <p>It is suggested to remove it as a consequence of the removal of the pest from Table 1.</p> <p><i>Category : TECHNICAL</i></p>
596	463	Razas y cepas de Ralstonia solanacearum que afectan a Musa spp.	P	<p>Colombia</p> <p>Debido a la naturaleza de Ralstonia solanacearum, que ocasiona la</p>

				muerte de la planta, no existe viabilidad comercial ni técnica para mantener en producción plantas afectadas. Por tanto, la posibilidad de que frutos infectados lleguen al punto de cosecha y posterior exportación es nula. <i>Category : SUBSTANTIVE</i>
597	464	PFPP ; SA-2	P	Colombia Due to the nature of <i>Ralstonia solanacearum</i> , which causes the death of the plant, there is no commercial or technical feasibility to keep affected plants in production. Therefore, the possibility of infected fruits reaching the point of harvest and subsequent export is nil. <i>Category : SUBSTANTIVE</i>
598	464	PFPP ; SA-2	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
599	464	PFA ; PFPP; SA 2	P	Egypt <i>Category : TECHNICAL</i>
600	464	PFPP; PFPS ; SA 2	P	Egypt Countries can establish different levels of PFZ including PFA, PFPP, PFPS <i>Category : TECHNICAL</i>
601	464	LPLP ; ES-2	P	Colombia Debido a la naturaleza de <i>Ralstonia solanacearum</i> , que ocasiona la muerte de la planta, no existe viabilidad comercial ni técnica para mantener en producción plantas afectadas. Por tanto, la posibilidad de que frutos infectados lleguen al punto de cosecha y posterior exportación es nula. <i>Category : SUBSTANTIVE</i>
602	466	* Export inspection targeting the pest of concern and the application of a remedial action if the pest is detected.	C	NEPPO Replace all "Export inspection" with "Phytosanitary inspection" to include both Import and Export. <i>Category : SUBSTANTIVE</i>
603	466	* Phytosanitary Export inspection targeting the pest of concern and the application of a remedial action if the pest is detected.	P	NEPPO <i>Category : SUBSTANTIVE</i>
604	467	† Field and export inspection targeting the pest of concern and the application of a corrective or remedial action if the pest is detected.	C	EPPO Need "corrective or" ? This is included in paragraph 466 and not here. <i>Category : TECHNICAL</i>
605	468	IRDN, irradiation (see Table 4); PFA, pest free area; PFPP, pest free place of production; SA, systems approach (see Table 5); TR4, Tropical Race 4.	P	COSAVE It is suggested to remove it as a consequence of the removal of the pest from Table 1. <i>Category : TECHNICAL</i>
606	469	Table 4. Options for irradiation (IRDN)	C	China

				<p>Suggest deleting Bactrocera carambolae Drew & Hancock, 1994 ; Bactrocera caryeae (Kapoor, 1971) ; Bactrocera cucumis (French, 1907) ; Bactrocera pyrifoliae Drew & Hancock, 1994 ; Zeugodacus tau (Walker, 1849) and related content.</p> <p>After searching databases such as EPPO, CABI and references to the attachments of this standard, the host of Bactrocera carambolae Drew & Hancock, 1994 ; Bactrocera caryeae (Kapoor, 1971) ; Bactrocera cucumis (French, 1907) ; Bactrocera pyrifoliae Drew & Hancock, 1994 ; Zeugodacus tau (Walker, 1849) don't include bananas, Zeugodacus tau (Walker, 1849) harm to fruits of Cucurbitaceae plants. According to ISPM 46 "Commodity-specific standards for phytosanitary measures" Article 2 List of pests associated with the commodity "This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on technical justification". At present, the above pests do not meet the conditions for inclusion in the list of pests.</p> <p>Category : <i>SUBSTANTIVE</i></p>
607	469	Table 4. Options for irradiation (IRDN)	C	<p>IPPC Regional Workshop Africa</p> <p>Consider capacity challenges, i.e. diagnostic protocols, systems approach in implementation guidance, this encourages regional harmonization. Rational: Ensures that low-capacity countries can still comply without undue trade restrictions; avoids regional trade disputes.</p> <p>Category : <i>TECHNICAL</i></p>
608	469	Table 4. Options for irradiation (IRDN)	C	<p>Kenya</p> <p>Consider capacity challenges, i.e. diagnostic protocols, systems approach in implementation guidance, this encourages regional harmonization. Rational: Ensures that low-capacity countries can still comply without undue trade restrictions; avoids regional trade disputes.</p> <p>Category : <i>TECHNICAL</i></p>
609	469	Cuadro 4. Opciones de irradiación (IRDN)	P	<p>OIRSA</p> <p>Por consistencia con la sugerencia de eliminar la plaga de la lista y eliminar estas medidas de irradiación</p> <p>Category : <i>SUBSTANTIVE</i></p>
610	490	IRDN 6	C	<p>United States of America</p> <p>Add new rows for IRDN 7 and IRDN 8</p> <p>IRDN 7 250 250 Gy for mealybugs (generic)</p> <p>IRDN 8 400 PT – (Irradiation treatment for soft scales including Ceroplastes rubens and Coccus viridis, family Coccidae)</p> <p>Category : <i>TECHNICAL</i></p>
611	493	Notes: Options in bold are PTs (phytosanitary treatments adopted as annexes to ISPM 28 (Phytosanitary treatments for regulated pests)); PTs are adopted by the Commission on Phytosanitary Measures (CPM); other treatments included in the table meet the criteria in ISPM 46 (of Commodity-specific standards for phytosanitary measures) but are not adopted by the CPM.	P	<p>EPPO</p> <p>There are no other treatments included in the table, so this can be removed.</p> <p>Category : <i>TECHNICAL</i></p>

612	496	Table 5. Options for systems approaches (SAs)	C	IPPC Regional Workshop Africa Consider capacity challenges, i.e. diagnostic protocols, systems approach in implementation guidance, this encourages regional harmonization. Rational: Ensures that low-capacity countries can still comply without undue trade restrictions; avoids regional trade disputes. <i>Category : TECHNICAL</i>
613	496	Table 5. Options for systems approaches (SAs)	C	Kenya Consider capacity challenges, i.e. diagnostic protocols, systems approach in implementation guidance, this encourages regional harmonization. Rational: Ensures that low-capacity countries can still comply without undue trade restrictions; avoids regional trade disputes. <i>Category : TECHNICAL</i>
614	503	SA 2	C	APPPC If additional reference is not available, pls. merge SA 2 & 3. If merged, table 3 should be modified. <i>Category : SUBSTANTIVE</i>
615	503	SA 2	C	PPPO SA2 & SA3 These measures would be difficult to implement without further detail on how they manage risk. <i>Category : SUBSTANTIVE</i>
616	504	<i>Pre-planting control measures</i> (e.g. area of low pest prevalence <u>prevalence, healthy planting materials</u>)	P	Australia SA2 & SA3 These measures would be difficult to implement without further detail on how they manage risk. Have examples as bullet points to make them easier to read. Proposal for each SA. <i>Category : SUBSTANTIVE</i>
617	504	<i>Pre-planting control measures</i> (e.g. area of low pest prevalence)	C	PPPO Have examples as bullet points to make them easier to read. Proposal for each SA. <i>Category : EDITORIAL</i>
618	504	<i>Pre-planting control measures</i> (e.g. area of low pest prevalence <u>prevalence, healthy planting materials</u>)	P	PPPO This of relevance to the specific pest. <i>Category : SUBSTANTIVE</i>
619	506	ISPM 14 (The use of integrated measures in a systems approach for pest risk management)	P	Korea, Republic of Korea proposes to delete ISPM 14 from the References section in Table 1. This is because ISPM 14 is already mentioned in the general option, and this option for systems approaches is based on data submitted by contracting parties. <i>Category : SUBSTANTIVE</i>
620	506	ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>)	C	EPPO This is not an appropriate reference, as ISPM 14 is not specific to <i>Ralstonia solanacearum</i> . Reference to ISPM 14 is already covered by paragraph 515. <i>Category : TECHNICAL</i>

621	507	[Additional reference pending]	C	EPPO When will this be provided? <i>Category : TECHNICAL</i>
622	507	[d'autres références seront ajoutées ultérieurement]	C	IPPC Regional Workshop Africa cette phrase ne nécessite pas d'être écrite ici, car il ne s'agit pas d'une référence et on ignore pour quelle mesure est-elle écrite là. Si elle est indispensable, cette phrase peut être mise en NB et non dans la colonne des références. Pourquoi le groupe responsable de cette norme n'a pas demandé les références de la mesure y afférente? <i>Category : SUBSTANTIVE</i>
623	509	<i>Pre-planting control measures</i> (e.g. area of low pest prevalence <u>prevalence, healthy planting materials</u>)	P	PPPO This of relevance to the specific pest. <i>Category : SUBSTANTIVE</i>
624	511	<i>Post-harvest and handling control measures</i> (e.g. pest monitoring and pest management in packing houses; <u>post-harvest dip treatment</u> ; washing, disinfecting, grading, drying).	C	Caribbean Agricultural Health and Food Safety Agency Could examples of specific active ingredients for appropriate, food-safe dips be included in SA3 (e.g., % chlorine, thiobendazole)? <i>Category : TECHNICAL</i>
625	513	<u>ISPM 14</u>	P	Korea, Republic of Same above the comment. <i>Category : SUBSTANTIVE</i>
626	513	<u>ISPM 14</u>	P	EPPO This is not an appropriate reference. Reference to ISPM 15 is already covered by paragraph 515. <i>Category : TECHNICAL</i>


5. Bibliography

627	517	5. Bibliography	C	United States of America The following references are based on US comments: Business Queensland. 2022–2025. Cryptic mealybug (Pseudococcus cryptus) can infest 42 host varieties, including banana. Business Queensland Biosecurity Plant Pests, Queensland Government, Australia. https://www.business.qld.gov.au/industries/farms-fishing-forestry/agriculture/biosecurity/plants/insects/horticultural/cryptic-mealybug EPPO (European and Mediterranean Plant Protection Organization). 2024. EPPO Global Database: Paracoccus marginatus. Hosts include banana (Musa spp.). Present in Florida, Puerto Rico, Guam, and Hawaii. https://gd.eppo.int Follett, P.A. 2004. Irradiation to control insects in fruits and vegetables for export from Hawaii. Radiation Physics and Chemistry, 71: 161–164. https://www.ars.usda.gov/ARSUserFiles/20400505/IrradRadPhys.pdf
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			<p>http://www.globalsciencebooks.info/Online/GSBOOnline/images/2010/TFSB_4(SI1)/TFSB_4(SI1)22-31o.pdf</p> <p>http://www.globalsciencebooks.info/Online/GSBOOnline/images/2010/TFSB_4(SI1)/TFSB_4(SI1)22-31o.pdf</p> <p>Pantoja, A. 2006. Recognition of Instars and Adult Trap Catches of <i>Cosmopolites sordidus</i> (Coleoptera: Curculionidae) from Plantains in Puerto Rico. <i>Annals of the Entomological Society of America</i>, 99(5): 875–881.</p> <p>United States Bureau of Entomology and Plant Quarantine, United States Plant Pest Control Division, and United States Plant Protection Division. 1951–1975. Cooperative economic insect report. U.S. Department of Agriculture, Agricultural Research Administration, Bureau of Entomology and Plant Quarantine, Washington, D.C. https://search.worldcat.org/title/1565049</p> <p>Woodruff, E.R. & Fasulo, T.R. 2007. Banana Root Borer, <i>Cosmopolites sordidus</i> (Germar) (Insecta: Coleoptera: Curculionidae). EENY-391/IN706, October 2006. Gainesville, FL: University of Florida IFAS Extension. EDIS 2007 (6). http://doi.org/10.32473/edis-in706-2006</p> <p>Category : <i>TECHNICAL</i></p>
5.2 Further reading			
628	538	<p>A.J. Allwood & R.A.I. Drew, eds. Heimoana, V., Leweniqila, L., Tau, D., Tunupopo, F., Nemeye, P., Kassim, A., Quashie-Williams, C., Allwood, A. & Leblanc, L. 1997. Non-host status as a quarantine treatment option for fruit flies. In: A.J. Allwood & R.A.I. Drew, eds. <i>Management of fruit flies in the Pacific</i>, pp. 225–231. A regional symposium, Nadi, Fiji, 28–31 October 1996. ACIAR Proceedings No. 76. Canberra, Australian Centre for International Agricultural Research. 267 pp.</p> <p>https://www.aciar.gov.au/sites/default/files/legacy/node/550/pr76_pdf_11192.pdf</p>	<p>P EPPO</p> <p>This paper refers to laboratory tests conducted 30 years ago that required field confirmation. It does not appear to be a relevant reference for this standard.</p> <p>The changes made will resolve the issue – as it is stated numerous times that green bananas are not hosts to FFs – with one caveat – this does NOT INCLUDE <i>Bactrocera musae</i>, where, for example it is written in the Proceedings: "the banana fruit fly <i>Bactrocera musae</i>, is a unique species in that it lays its eggs in immature green banana. It is major pest in eastern Queensland where banana is an important commercial crop. None of the pest species in the Asian region are known to lay their eggs in immature green banana and consequently, the banana industry in the region currently flourishes without the worry of fruit fly infestation by harvesting banana at a green stage. Malaysia and other countries in the region have also been exporting bananas to Japan for several years based on the non host status of green banana. The banana fruit fly, if introduced, could drastically alter the current scenario in the Asian region."</p> <p>Therefore, the specific physiological stage of maturity at harvest</p>

				needs to be deleted from paragraph 342. <i>Category : TECHNICAL</i>
629	541	Leblanc, L., Vueti, E.T. & Allwood, A.J. 2013. Host plant records for fruit flies (Diptera: Tephritidae: Dacini) in the Pacific Islands: 2. Infestation statistics on economic hosts. <i>Proceedings of the Hawaiian Entomological Society</i> , 45: 83–117. http://hdl.handle.net/10125/31008 (New reference) Mararuai A. (2010) Market access of Papua New Guinea Bananas (<i>Musa spp.</i>) with particular respect to Banana fly (<i>Bactrocera musae</i> (Tryon)) (Diptera: Tephritidae). PhD Thesis, School of Natural Resource Sciences, Queensland University of Technology, Australia.	P	New Zealand Adding reference for proposing the deletion of the specific measure for B. musa in Table 3. <i>Category : TECHNICAL</i>
Potential implementation issues				
630	556	This section is not part of the standard. The Standards Committee in May 2016 requested the secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues: File annex	P	Colombia The historical trade in fresh banana fruit shows that this standard is unnecessary, as countries have now been applying the standards of the standards published by the IPPC related to this type of trade (ISPM No. 2, 11, 14, 21). Colombia has a significant historical trade in fresh banana fruit on different continents. By 2024, the country registered exports to 55 countries for more than 1.1 million tons, and in the period from January to July 2025, nearly one million tons have been exported. The issuance of this document puts at risk the sustainability of more than 80,000 hectares registered for export, which currently generates about 63,500 direct jobs and 195,000 indirect jobs in the country and the investment in social programs in housing, education, health and recreation that benefits more than 200,000 families, as a result of the exports of fresh fruit from Musa spp. of Colombian origin. <i>Category : SUBSTANTIVE</i>
631	556	Archivar anexo Esta sección no forma parte de la norma. En mayo de 2016, el Comité de Normas pidió a la Secretaría que reuniera información sobre los posibles problemas de aplicación relacionados con este proyecto. Les rogamos que proporcione información detallada sobre estos posibles problemas de aplicación y formulen propuestas para abordarlos.	P	Colombia El comercio histórico de fruta fresca de banano muestra que esta norma es innecesaria, pues en la actualidad los países han venido aplicando los estándares de las normas publicados por la CIPF, relacionados con este tipo de comercio (NIMF No. 2, 11, 14, 21). Colombia presenta un comercio histórico de fruta fresca de banano significativo en los diferentes continentes. Para el 2024 el país registró exportaciones a 55 países por más de 1,1 millones de toneladas, y en el periodo de enero a julio de 2025 se han exportado cerca de un millón de toneladas. La emisión de este documento coloca en riesgo la sostenibilidad de más de 80.000 hectáreas registradas para exportación, que actualmente genera cerca de 63.500 empleos directos y 195.000 indirectos en el país y la inversión en programas sociales en materia de vivienda, educación, salud y recreación que beneficia a más 200.000 familias, como resultado de las exportaciones de fruta fresca de Musa spp. de origen Colombia. <i>Category : SUBSTANTIVE</i>

APPENDIX 1: Bunches, hands and clusters of <i>Musa</i> spp.				
632	558	 APPENDIX 1: Bunches, hands and clusters of <i>Musa</i> spp.	C	PPPO Include a picture of a 'single' as 'singles' are included in the text. <i>Category : SUBSTANTIVE</i>
633	559	Figure 1. Bunches of <i>Musa</i> spp.	C	EPPO Change to font size 8. <i>Category : EDITORIAL</i>
634	563	Figure 3. Clusters (parts of hands) of <i>Musa</i> spp.	P	EPPO Added a full stop at the end of spp. <i>Category : EDITORIAL</i>