

2024 SECOND CONSULTATION 1 July – 30 September 2024

Compiled comments for Draft annex Use of systems approaches in managing the pest risks associated with the movement of wood to ISPM 39 (2015-004)

Participants

Name	Summary
Gabon	Nous validons ce projet d'annexe à la NIMP 39.
Malawi	We support the Draft Annex
Saint Vincent and The Grenadines	None
Sao Tomé and Príncipe	Rien a signaler
South Africa	<ul style="list-style-type: none"> Documenting the wood-commodities systems approach, providing supporting information, and consistent communication between NPPO's and relevant stakeholders are crucial for ensuring successful implementation at each point along the process.

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


S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (335) Costa Rica (30 Sep 2024 11:32 PM) Comments from the Latin American Workshop and OIRSA are supported.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (331) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM) St. Vincent and the Grenadines is in agreement with the comments submitted by CAHFSA that came out of the IPPC Regional workshop for the Caribbean
G	(General Comment)	C	<i>Category : EDITORIAL</i> (330) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM) Jamaica fully supports this annex as movement of wood is a significant pathway for the movement of pest. This annex will give further guidance for the management of this risk.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (329) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM)

			Raising awareness about the implications of climate change on pest management among stakeholders including forest managers, policymakers, and the public is crucial for the effective implementation of pest risk management strategies. By employing a systems approach that incorporates these elements, stakeholders can better manage the pest risks associated with wood movement in the context of climate change, ensuring the protection of ecosystems and agricultural productivity.
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(328) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM)</p> <p>Barbados supports the adoption of this annex with the changes as recommended by CAHFSA.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(305) Antigua and Barbuda (30 Sep 2024 2:45 PM)</p> <p>Antigua and Barbuda endorses the comments submitted in the CAHFSA workgroup and agreed to at the 2024 IPPC Regional Workshop for the Caribbean.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(303) Guyana (30 Sep 2024 2:04 PM)</p> <p>Guyana endorses the comments submitted by CAHFSA.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(302) Barbados (30 Sep 2024 12:44 PM)</p> <p>Barbados endorses the comments submitted by CAHFSA.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(299) Korea, Republic of (30 Sep 2024 6:19 AM)</p> <p>Korea supports the comments made by APPPC.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p>(298) Peru (30 Sep 2024 12:11 AM)</p> <p>Peru supports COSAVE's comments</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(297) Saint Vincent and The Grenadines (29 Sep 2024 5:37 PM)</p> <p>St. Vincent and the Grenadines is in agreement with the comments submitted by CAHFSA that came out of the IPPC Regional workshop for the Caribbean</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(294) Mexico (28 Sep 2024 7:25 PM)</p> <p>Mexico supports the DRAFT ANNEX TO ISPM-39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004). No comments at the moment.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(293) Nigeria (28 Sep 2024 2:04 AM)</p> <p>NIGERIA HAS NO OBJECTIONS.</p>

G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(292) Germany (28 Sep 2024 12:29 AM)</p> <p>Germany would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p>(258) Chile (27 Sep 2024 4:28 PM)</p> <p>Chile supports the comments made by COSAVE</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(207) Benin (26 Sep 2024 12:58 PM)</p> <p>Le Bénin soutien la proposition de l'Afrique du Sud</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p>(206) Kenya (26 Sep 2024 12:06 PM)</p> <p>Kenya supports the use of the systems approach. However there is need to support the capacity in the area of systems approach especially in the developing countries and the use of the Beyond Compliant Global tools.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(191) Brazil (24 Sep 2024 5:24 PM)</p> <p>Brazil supports COSAVE's comments and suggestions</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(190) United Kingdom (24 Sep 2024 4:51 PM)</p> <p>The UK would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System. EPPO have submitted these comments on behalf of the UK and as such they should be considered as UK national comments.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(189) Switzerland (24 Sep 2024 12:23 PM)</p> <p>Switzerland would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p>(188) Uruguay (21 Sep 2024 1:34 PM)</p> <p>Uruguay agrees with COSAVE comments</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(66) New Zealand (11 Sep 2024 1:32 AM)</p> <p>New Zealand supports the APPPC comments</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(65) APPPC (9 Sep 2024 12:22 PM)</p> <p>1. APPPC to consider the format of the annex related to systems approaches in ISPM 38 and ISPM 39.</p> <p>2. Apppc to consider to have consistency on the use of "wood" or "wood commodity".</p> <p>New Zealand (11 Sep 2024 1:31 AM)</p>

			This is APPPC suggestion for IPPC to consider the two issues raised
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (44) Dominican Republic (23 Aug 2024 12:34 AM) We support OIRSA and the comments from the IPPC LATAM group.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (41) Sri Lanka (22 Aug 2024 7:44 AM) Generally this draft annex covers most of the areas and supportive to the ISPM 39 and acceptable</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (36) Cote d'Ivoire (21 Aug 2024 5:00 PM) Nous prenons acte de la proposition d'annexe à la NMP 39 qui permet aux ONPV de mieux gérer les aspects phytosanitaires liés au bois, en plus des matériaux d'emballage en bois encadrés par la NIMP 15.</p>
G	(General Comment)	C	<p><i>Category : EDITORIAL</i> (34) South Africa (20 Aug 2024 1:58 PM) Documenting the wood-commodities systems approach, providing supporting information, and consistent communication between NPPO's and relevant stakeholders are crucial for ensuring successful implementation at each point along the process.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (28) Thailand (19 Aug 2024 8:48 AM) Thailand has no objection to this draft standard. However, the consistency of the format of an annex related to systems approaches in ISPM 38 and ISPM 39 should be considered by SC.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (26) OIRSA (19 Aug 2024 3:47 AM) In 2023, the draft of this annex was reviewed and the comments from the OIRSA region have not been considered.</p> <p>All practices or actions included before planting are not feasible for implementation as they are products with long life cycles.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (11) New Zealand (9 Aug 2024 5:48 AM) New Zealand supports the adoption of the annex incorporating country comments.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (1) Nigeria (24 Jul 2024 5:33 PM) No comments</p>
1	DRAFT ANNEX TO ISPM 39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004)	C	<p><i>Category : SUBSTANTIVE</i> (332) Russian Federation (30 Sep 2024 5:01 PM) 'General comment': "The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online</p>



		Comment System"
1	DRAFT ANNEX TO ISPM 39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004)	C <i>Category : SUBSTANTIVE</i> (321) Australia (30 Sep 2024 3:21 PM) Australia supports the comments of the PPPO in this Annex.
1	DRAFT ANNEX TO ISPM 39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004)	C <i>Category : SUBSTANTIVE</i> (301) Viet Nam (30 Sep 2024 9:41 AM) Viet Nam agree with APPPC propose: 1. APPPC to consider the format of the annex related to systems approaches in ISPM 38 and ISPM 39. 2. Apppc to consider to have consistency on the use of "wood" or "wood commodity".
1	DRAFT ANNEX TO ISPM 39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004)	C <i>Category : SUBSTANTIVE</i> (295) Malawi (29 Sep 2024 11:30 AM) We support the Draft Annex to ISPM 39
1	DRAFT ANNEX TO ISPM 39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004)	C <i>Category : SUBSTANTIVE</i> (208) Myanmar (27 Sep 2024 9:59 AM) NPPO Myanmar supports the Draft Annex to ISPM 39.
1	DRAFT ANNEX TO ISPM 39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004) PROYECTO DE ANEXO A LA NIMF 39: Uso de enfoques de sistemas para la gestión del riesgo de plagas asociado con el movimiento de madera (2015-004)	P <i>Category : SUBSTANTIVE</i>  Honduras (59) Honduras (8 Sep 2024 7:14 PM) Honduras apoya a lo enunciado en el taller IPPC LATAM
1	DRAFT ANNEX TO ISPM 39: Use of systems approaches in managing the pest risk associated with the movement of wood (2015-004)	C <i>Category : SUBSTANTIVE</i> (37) IPPC Regional Workshop Africa (21 Aug 2024 5:03 PM) We support the Draft Annex to ISPM 39
2	Status box	C <i>Category : SUBSTANTIVE</i> (296) Malawi (29 Sep 2024 11:31 AM) We support the Draft Annex to ISPM 39
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood commodities on the use, within the context of a wood commodities This annex provides guidance to national plant protection organizations (NPPOs) on the use systems approach, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood Specifically, it identifies examples of gymnosperms specific practices, procedures and angiosperms regulatory actions that may be applied as described integrated measures in the core text a systems approach from This annex provides guidance to national plant protection organizations (NPPOs) on the use systems approach, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood Specifically, it identifies examples of gymnosperms specific practices, procedures and angiosperms regulatory actions that may be applied as described integrated measures in the core text a systems approach from	P <i>Category : SUBSTANTIVE</i> (210) European Union (27 Sep 2024 11:20 AM) Improved clarity and accuracy. Final sentence moved to paragraph 31. New last sentence coming from paragraph 31.

	pre-planting to post-import of this standard wood, to meet phytosanitary import requirements.		
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood-commodities systems approach, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood of gymnosperms and angiosperms as described in the core text of this standard.	C	<p>Category : EDITORIAL</p> <p>(209) Myanmar (27 Sep 2024 10:03 AM)</p> <p>We support the APPPC comment wood or wood commodities.</p>
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood-commodities This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a systems approach for wood commodities, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood of gymnosperms and angiosperms as described in the core text of this standard.	P	<p>Category : EDITORIAL</p> <p>(151) Canada (18 Sep 2024 3:07 PM)</p>
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood-commodities This annex provides guidance to national plant protection organizations (NPPOs) on the use, -systems approach, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood Specifically, it identifies examples of gymnosperms specific practices, procedures and angiosperms regulatory actions that may be applied as described-integrated measures in the core text-a systems approach, from pre-planting to post-import of this standard wood, to meet phytosanitary import requirements.	P	<p>Category : SUBSTANTIVE</p> <p>(72) EPPO (13 Sep 2024 6:36 PM)</p> <p>Improved clarity and accuracy. Final sentence moved to paragraph 31. New last sentence coming from paragraph 31.</p>
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood-commodities This annex provides guidance to national plant protection organizations (NPPOs) on the use -systems approach, of specific integrated measures that, when applied together integrated in a systems approach, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood of gymnosperms	P	<p>Category : TECHNICAL</p> <p>(45) COSAVE (26 Aug 2024 5:30 PM)</p> <p>1) To clarify and be consistent with the definition of systems approach in ISPM 5, 2) As commented during first consultation last sentence should be deleted to avoid repetition with the scope of ISPM 39. If it is not accepted it should read exactly as in the core text: "This annex covers wood of gymnosperms and angiosperms (i.e. dicotyledons and some monocotyledons, such as palms), but not bamboo and rattan"</p>

	and angiosperms as described in the core text of this standard.		
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood-commodities systems approach, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood of gymnosperms and angiosperms as described in the core text of this standard.	C	Category : <i>TECHNICAL</i> (39) Sri Lanka (22 Aug 2024 7:36 AM) the context of wood -commodities (eg: propose to specify wood commodities)
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood-commodities systems approach, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood of gymnosperms and angiosperms as described in the core text of this standard.	C	Category : <i>SUBSTANTIVE</i> (29) South Africa (20 Aug 2024 1:51 PM) proposal for insertion of the following text:" This annex outlines the basic elements of a generic systems approach with considerations to be taken in developing and implementing specific approaches. Due to the varying risks associated with wood commodities and their intended use, it does not provide specific requirements for any wood-commodities systems approach. Instead, it provides a framework that can be adapted to address the unique pest risks and operational practices relevant to particular systems".
30	This annex provides guidance to national plant protection organizations (NPPOs) on the use, within the context of a wood-commodities systems approach, of specific integrated measures that, when applied together, reduce the pest risk posed by quarantine pests associated with the international movement of wood. This annex applies to the wood of gymnosperms and angiosperms as described in the core text of this standard.	P	Category : <i>TECHNICAL</i> (18) Uruguay (18 Aug 2024 2:16 AM) 1) To clarify and be consistent with the definition of systems approach in ISPM 5, 2) As commented during first consultation this sentence should be deleted to avoid repetition with the scope of ISPM 39. If it is not accepted it should read exactly as in the core text: "This annex covers wood of gymnosperms and angiosperms (i.e. dicotyledons and some monocotyledons, such as palms), but not bamboo and rattan.
31	This annex relates to quarantine pests associated with wood and to specific locations within the wood. It identifies examples of specific practices, procedures and regulatory actions that may be applied as integrated measures in a systems approach, from pre-planting to post-import of wood, to meet phytosanitary import requirements. It also details the documentation required to demonstrate that measures have been applied. The responsibilities of NPPOs and participating entities in developing the systems approach, implementing the systems approach and supervising the implementation are described.	C	Category : <i>EDITORIAL</i> (333) Congo, DR (30 Sep 2024 7:54 PM) nous soutenons ce projet et appuyons les commentaires de la region afrique
31	This annex <u>applies to the wood of gymnosperms and angiosperms, as described in the core text of this standard, and</u> relates to quarantine pests associated with wood	P	Category : <i>TECHNICAL</i> (211) European Union (27 Sep 2024 11:51 AM) Improved accuracy and clarity. Moved the last sentence of para 30 to the

	and to specific locations within the wood. It identifies examples of specific practices, procedures and regulatory actions that may be applied as integrated measures in a systems approach, from pre-planting to post-import of wood, to meet phytosanitary import requirements. It also <u>The annex</u> details the documentation required to demonstrate that measures have been applied. The responsibilities of NPPOs and participating entities in developing the systems approach, implementing the systems approach and supervising the implementation are <u>also</u> described.		beginning of para 31. Moved the second sentence of para 31 to para 30. Moved the last two sentences of para 31 to a new paragraph.
31	This annex <u>annex applies to the wood of gymnosperms and angiosperms, as described in the core text of this standard, and</u> relates to quarantine pests associated with wood and to specific locations within the wood. It identifies examples of specific practices, procedures and regulatory actions that may be applied as integrated measures in a systems approach, from pre-planting to post-import of wood, to meet phytosanitary import requirements. It also <u>The annex</u> details the documentation required to demonstrate that measures have been applied. The responsibilities of NPPOs and participating entities in developing the systems approach, implementing the systems approach and supervising the implementation are <u>also</u> described.	P	<i>Category : TECHNICAL</i> (73) EPPO (13 Sep 2024 6:36 PM) Improved accuracy and clarity. Moved the last sentence of para 30 to the beginning of para 31. Moved the second sentence of para 31 to para 30. Moved the last two sentences of para 31 to a new paragraph.
31	This annex relates to quarantine pests associated with wood and to specific locations within the wood. It identifies examples of specific practices, procedures and regulatory actions that may be applied as integrated measures in a systems approach, from pre-planting to post-import of wood, to meet phytosanitary import requirements. It also details the documentation required to demonstrate that measures have been applied. The responsibilities of NPPOs and participating entities in developing the systems approach <u>developing</u> , implementing the systems approach and supervising the <u>implementation systems approach</u> are described.	P	<i>Category : EDITORIAL</i> (68) New Zealand (11 Sep 2024 1:40 AM) simplifying the sentence
31	This annex relates to quarantine pests associated with wood and to their specific locations within the wood. It identifies examples of specific practices, procedures and regulatory actions that may be applied as integrated measures in a systems approach, from pre-planting to post-import of wood, to meet phytosanitary import requirements. It also details the documentation required to demonstrate that measures have been applied. The responsibilities of NPPOs and participating entities in developing the systems approach, implementing the systems approach	P	<i>Category : EDITORIAL</i> (67) New Zealand (11 Sep 2024 1:34 AM)

	and supervising the implementation are described.		
31	This annex relates to quarantine pests associated with wood and to specific locations within the wood. It identifies examples of specific practices, procedures and regulatory actions that may be applied as integrated measures in a systems approach, from pre-planting to post-import of wood, to meet phytosanitary import <u>and export</u> requirements. It also details the documentation required to demonstrate that measures have been applied. The responsibilities of NPPOs and participating entities in developing the systems approach, implementing the systems approach and supervising the implementation are described.	P	Category : <i>SUBSTANTIVE</i> (35) Guinea-Bissau (21 Aug 2024 1:01 PM)
33	Countries predominantly rely on treatments and processing to manage the pest risk associated with the movement of wood commodities across their borders. A systems approach is an alternative to a single phytosanitary measure, such as a treatment, or can replace more restrictive phytosanitary measures, such as prohibition. A systems approach may also provide countries with additional opportunities to facilitate or expand trade while effectively managing pest risk.	C	Category : <i>EDITORIAL</i> (334) Congo, DR (30 Sep 2024 7:58 PM) nous recommandons l'application de cet annexe 39 et en conformité avec les commentaires avec le groupe afrique
33	<u>Countries predominantly rely on treatments and processing to manage the pest risk associated with the movement of wood commodities across their borders. A systems approach is an alternative to a single phytosanitary measure, such as a treatment, or can replace more restrictive phytosanitary measures, such as prohibition. Countries predominantly rely on treatments and processing to manage the pest risk associated with the movement of wood commodities across their borders. A systems approach may also provide countries with additional opportunities to facilitate a single phytosanitary measure, such as a treatment, or expand trade while effectively managing can replace more restrictive phytosanitary measures, such as prohibition., on the condition that the systems approach results in an acceptable pest risk reduction. By doing so, a systems approach may provide countries with additional opportunities to facilitate or expand trade while effectively managing pest risk.</u>	P	Category : <i>SUBSTANTIVE</i> (212) European Union (27 Sep 2024 11:59 AM) Improved clarity and accuracy. Amended the second sentence to add an important clarification. Amended the third sentence to improve the linkage with the previous sentence – added "By doing so.." and removed "also".
33	<u>Countries predominantly rely on treatments and processing to manage the pest risk associated with the movement of wood commodities across their borders. A systems approach is an alternative to a single phytosanitary measure, such as a treatment, or can replace more restrictive phytosanitary measures, such as</u>	P	Category : <i>SUBSTANTIVE</i> (74) EPPO (13 Sep 2024 6:36 PM) Improved clarity and accuracy. Amended the second sentence to add an important clarification. Amended the third sentence to improve the linkage with the previous sentence – added "By doing so.." and removed "also".


	prohibition. Countries predominantly rely on treatments and processing to manage the pest risk associated with the movement of wood commodities across their borders. A systems approach may also provide countries with additional opportunities is an alternative to facilitate a single phytosanitary measure, such as a treatment, or expand trade while effectively managing can replace more restrictive phytosanitary measures, such as prohibition, on the condition that the systems approach results in an acceptable pest risk reduction. By doing so, a systems approach may provide countries with additional opportunities to facilitate or expand trade while effectively managing pest risk.		
34	Any systems approach for wood <u>commodities</u> should be developed in accordance with ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>).	P	Category : EDITORIAL (69) New Zealand (11 Sep 2024 1:41 AM) for consistency. also see APPPC general comment
36	1. <u>Developing a wood-commodities a systems approach approach for wood commodities</u>	P	Category : EDITORIAL  Myanmar (152) Canada (18 Sep 2024 3:08 PM)
36	1. <u>Developing a wood-commodities systems approach</u>	C	Category : SUBSTANTIVE  Congo, DR (38) IPPC Regional Workshop Africa (21 Aug 2024 5:03 PM) We recoment im+lementation of the ISPM 15
37	Development of a wood-commodities systems approach requires knowledge of the biology of the pest or pests associated with the wood commodity or commodities (Appendix 1 to this annex), the production chain of the commodity or commodities, any post-harvest treatments or processing that have been applied, and the associated pest risk. Specific practices, procedures and regulatory actions to be included as measures in the systems approach should be effective and feasible. The selection of the measures in the systems approach should be agreed between the NPPO of the importing country and the NPPO of the exporting country.	C	Category : EDITORIAL (214) European Union (27 Sep 2024 12:05 PM) Is it really necessary to have it in singulars and plurals (pest or pests; commodity or commodities)? It complicates the text and makes it more difficult to understand. What about "biology of the pests associated with the wood commodity", "production chain of the commodity"?
37	Development of a wood-commodities systems approach requires knowledge of the biology of the pest or pests associated with the wood commodity or commodities (Appendix 1 to this annex), <u>and knowledge of the pest's geographical distribution and host range, and the</u> production chain of the commodity or commodities, any post-harvest treatments or processing that have been applied, and the associated pest risk . Specific practices, procedures and regulatory actions to be included as	P	Category : SUBSTANTIVE (213) European Union (27 Sep 2024 12:04 PM) Removal of "any post harvest treatments or processing that have been applied, and the associated pest risk" – post harvest treatments and processing is what we are advising on as part of the standard and is not a pre-requisite

	measures in the systems approach should be effective and feasible. The selection of the measures in the systems approach should be agreed between the NPPO of the importing country and the NPPO of the exporting country.		
37	Development of a wood-commodities systems approach requires knowledge of the biology of the pest or pests associated with the wood commodity or commodities (Appendix 1 to this annex), the production chain of the commodity or commodities, any post-harvest treatments or processing that have been are applied, and the associated pest risk. Specific practices, procedures and regulatory actions to be included as measures in the systems approach should be effective and feasible. The selection of the measures in the systems approach should be agreed between-upon by the NPPO of the importing country and the NPPO of the exporting country.	P	<i>Category : EDITORIAL</i> (153) Canada (18 Sep 2024 3:09 PM)
37	Development of a wood-commodities systems approach requires knowledge of the biology of the pest or pests associated with the wood commodity or commodities (Appendix 1 to this annex annex) and knowledge of, the pest's geographic distribution and host range, and , the production chain of the commodity or commodities, any post-harvest treatments or processing that have been applied, and the associated pest risk . Specific practices, procedures and regulatory actions to be included as measures in the systems approach should be effective and feasible. The selection of the measures in the systems approach should be agreed between the NPPO of the importing country and the NPPO of the exporting country.	P	<i>Category : SUBSTANTIVE</i> (76) EPPO (13 Sep 2024 6:36 PM) Removal of "any post harvest treatments or processing that have been applied, and the associated pest risk" – post harvest treatments and processing is what we are advising on as part of the standard and is not a pre-requisite
37	Development of a wood-commodities systems approach requires knowledge of the biology of the pest or pests associated with the wood commodity or commodities (Appendix 1 to this annex), the production chain of the commodity or commodities, any post-harvest treatments or processing that have been applied, and the associated pest risk. Specific practices, procedures and regulatory actions to be included as measures in the systems approach should be effective and feasible. The selection of the measures in the systems approach should be agreed between the NPPO of the importing country and the NPPO of the exporting country.	C	<i>Category : EDITORIAL</i> (75) EPPO (13 Sep 2024 6:36 PM) Is it really necessary to have it in singulars and plurals (pest or pests; commodity or commodities)? It complicates the text and makes it more difficult to understand. What about "biology of the pests associated with the wood commodity", "production chain of the commodity"?
37	Development of a wood-commodities systems approach requires knowledge of the biology of the <u>regulated</u> pest or pests associated with the wood commodity or commodities (Appendix 1 to this annex), the production chain of the commodity or	P	<i>Category : TECHNICAL</i> (70) New Zealand (11 Sep 2024 1:47 AM) For steward consideration, quarantine or regulated pest

	commodities, any post-harvest treatments or processing that have been applied, and the associated pest risk. Specific practices, procedures and regulatory actions to be included as measures in the systems approach should be effective and feasible. The selection of the measures in the systems approach should be agreed between the NPPO of the importing country and the NPPO of the exporting country.		
38	During the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g. those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage one pest on the pathway may not manage all pests for which the pest risk needs to be reduced. However, pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country.	P	<i>Category : SUBSTANTIVE</i> (318) Australia (30 Sep 2024 3:15 PM) PFA measures are incorporated in Table 1 below.
38	During the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g. those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage one pest on the pathway may not manage all pests for which the pest risk needs to be reduced. However, pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country.	C	<i>Category : SUBSTANTIVE</i> (317) Australia (30 Sep 2024 3:14 PM) This section is relevant, but would be better if placed in the pre-export component of section 2.
38	During the long production cycle of wood, the pest status of the relevant area of production can change. This means that some measures (e.g. those applied before planting or during a plant's the early stages of plant growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage one pest on during the pathway-growth cycle may not manage all pests for which the pest risk needs to be reduced. However,	P	<i>Category : SUBSTANTIVE</i> (215) European Union (27 Sep 2024 12:10 PM) Better wording and moved the information on pest free areas to a new para, as it is talking about a different topic.

	pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country.		
38	<p>During the long production cycle of wood, the pest status of the relevant area of production can change. This means that some measures (e.g. those applied before planting or during a plant's the early stages of plant growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach.</p> <p>Pest free areas established to manage one pest on-during the pathway-growth cycle may not manage all pests for which the pest risk needs to be reduced. However, pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country.</p>	P	<p>Category : SUBSTANTIVE (77) EPPO (13 Sep 2024 6:36 PM) Better wording and moved the information on pest free areas to a new para, as it is talking about a different topic.</p>
38	<p>During the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g. those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage one pest on the pathway may not manage all pests for which the pest risk needs to be reduced. However, pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country.</p>	P	<p>Category : SUBSTANTIVE (157) Canada (18 Sep 2024 3:16 PM) Need to clarify what good forest practices stand for and how this sentence is linked to the previous sentence.</p>
38	<p>During the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g., those those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approachapproach for wood commodities. Pest free areas established to manage one pest on the pathway may not manage all pests for which the pest risk needs to be reduced. However, pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary</p>	P	<p>Category : EDITORIAL (154) Canada (18 Sep 2024 3:12 PM)</p>

	import requirements of an importing country.		
38	During Due to the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g. those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage one pest on the pathway may not manage all pests for which the pest risk needs to be reduced. However, pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country.	P	Category : EDITORIAL (71) New Zealand (11 Sep 2024 1:48 AM)
38	During the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g. those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage <u>the pest risk of</u> one pest on the pathway may not manage all pests for which the pest risk needs to be reduced of all pests. However, <u>a pest free areas-area is a stand-alone measure for a specified target pest (see also ISPM 4) that</u> may be components <u>component</u> of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country <u>developed for other pests</u> .	P	Category : SUBSTANTIVE (46) COSAVE (26 Aug 2024 5:41 PM) 1) The PFAs are established not to manage pests, but to manage pest risk,. 2) Last sentence modified to clarify that although a PFA could be required for one target pest in a wood-commodity systems approach, the PFA is an stand alone measure as provided in ISPM 4, that could be included in a systems approach for wood commodities for one pest but not integrated in the systems approach.
38	During the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g. those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage <u>the risk of</u> one pest on the pathway may not manage all pests for which the pest risk needs to be reduced of all pests. However, <u>a pest free areas-area is an stand-alone measure for a specified target pest (see also ISPM 4) that</u> may be components <u>component</u> of	P	Category : SUBSTANTIVE (19) Uruguay (18 Aug 2024 2:24 AM) 1) A PFA is established not to manage pests, but to manage pest risk,. 2) Last sentence modified to clarify that PFA could be required for only one target pest and not for all pests included in a wood-commodity systems approach

	a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country developed for other pests.		
38	During the long production cycle of wood, the pest status of the relevant area can change. This means that some measures (e.g. those applied before planting or during a plant's early growth) may be less relevant in a systems approach for wood commodities than in systems approaches for other commodities. Therefore, good forestry practice (Table 1) should be one of the basic requirements for implementing a wood-commodities systems approach. Pest free areas established to manage one pest on the pathway may not manage all pests for which the pest risk needs to be reduced. However, pest free areas may be components of a wood-commodities systems approach (see also ISPM 14) to meet the phytosanitary import requirements of an importing country.	P	<p>Category : TECHNICAL</p> <p> Belarus</p> <p>(2) United States of America (26 Jul 2024 4:21 PM)</p> <p>Adds clarity about what good forestry practice is.</p>
40	Practices, procedures and regulatory actions that can reduce pest risk, relating to activities in an exporting country from pre-planting to transport, are described in Table 1. These may be included <u>as integrated measures</u> in a systems approach.	P	<p>Category : SUBSTANTIVE</p> <p>(316) Australia (30 Sep 2024 3:12 PM)</p> <p>Addition for clarity and readability.</p>
40	Practices, procedures and regulatory actions that can reduce pest risk, <u>relating related</u> to activities in an exporting country from pre-planting to transport, are described in Table 1. These may be included in a systems approach.	P	<p>Category : EDITORIAL</p> <p>(216) European Union (27 Sep 2024 12:11 PM)</p> <p>Improvement.</p>
40	Practices, procedures and regulatory actions that can reduce pest risk, <u>relating related</u> to activities in an exporting country from pre-planting to transport, are described in Table 1. These may be included in a systems approach.	P	<p>Category : EDITORIAL</p> <p>(78) EPPO (13 Sep 2024 6:36 PM)</p> <p>Improvement.</p>
41	Table 1. Examples of pre-import practices, procedures and regulatory actions that may be used in a wood-commodities systems approach	C	<p>Category : SUBSTANTIVE</p> <p>(192) PPPO (24 Sep 2024 5:58 PM)</p> <p>To consider differences for tropical and temperate forests.</p> <p>The current layout of the Table and examples put a lot of emphasis in pre-export practices. In the SWP region, and perhaps others, timber is often exported without any post-harvest treatment and so, the systems approaches components should be implemented post import. We request the steward to reformat or make it clearer to accommodate this production system.</p>
41	Table 1. Examples of pre-import practices, procedures and regulatory actions that may be used in a wood-commodities a systems approach <u>approach for wood commodities</u>	P	<p>Category : EDITORIAL</p> <p>(155) Canada (18 Sep 2024 3:12 PM)</p>
44	Pre-planting assessments, including determining the site suitability for the host species and	P	Category : SUBSTANTIVE

	pests of concern, may be used to avoid planting in unsuitable conditions <u>where conditions are suitable for the pest</u> .		(304) Australia (30 Sep 2024 2:41 PM) Clarifying the conditions to be avoided in planting.
44	Pre-planting assessments, including determining the site suitability for the host species and pests of concern, may be used to avoid planting in unsuitable conditions <u>areas</u> .	P	<i>Category : EDITORIAL</i> (156) Canada (18 Sep 2024 3:13 PM)
44	Pre-planting assessments, including determining the site suitability for the host species and pests of concern, may be used to avoid planting in unsuitable conditions.	C	<i>Category : EDITORIAL</i> (40) Sri Lanka (22 Aug 2024 7:41 AM) instead of the word unsuitable the word unfavorable is better
46	Tillage to improve drainage before planting can may reduce pest populations and soil-borne diseases.	P	<i>Category : SUBSTANTIVE</i> (314) Australia (30 Sep 2024 3:05 PM) For clarity and consistency of language.
46	Tillage to improve drainage before planting can reduce pest populations and soil-borne diseases.	C	<i>Category : EDITORIAL</i> (217) European Union (27 Sep 2024 12:12 PM) Soil-borne fungal pathogens are pests (ISPM 5). It is true that 'diseases' are not equal to 'pathogens', but the sentence can be reworded (e.g. by deleting 'and soil-borne diseases').
46	Tillage to improve drainage before planting can reduce pest populations and soil-borne diseases.	C	<i>Category : EDITORIAL</i> (79) EPPO (13 Sep 2024 6:36 PM) Soil-borne fungal pathogens are pests (ISPM 5). It is true that 'diseases' are not equal to 'pathogens', but the sentence can be reworded (e.g. by deleting 'and soil-borne diseases').
47	Species selection	C	<i>Category : TECHNICAL</i> (30) South Africa (20 Aug 2024 1:53 PM) Proposal for addition of "cultivar" in paragraph 47, to align with text on point 48.
47	Species selection <u>Seed selection</u>	P	<i>Category : SUBSTANTIVE</i> (14) Colombia (9 Aug 2024 11:24 PM) it is proposed to add a row with the name: "Seed selection" which is considered as a mechanism for risk reduction before planting.
48	Planting species and cultivars of trees that are appropriate for the particular geographical <u>particular</u> region, soil and climatic conditions can reduce plant stress and susceptibility to pests. Planting forests with mixed species rather than using pure stands or clonal trees can reduce the vulnerability of forests to pests.	P	<i>Category : EDITORIAL</i> (218) European Union (27 Sep 2024 12:13 PM) 'Geographical' can be deleted. E.g. "Administrative regions" are not "geographical regions".
48	Planting species and cultivars of trees that are appropriate for the particular geographical region, soil and climatic conditions can reduce plant stress and susceptibility to pests. Planting forests with mixed species rather than using pure stands or clonal trees can reduce the vulnerability of forests to pests.	P	<i>Category : EDITORIAL</i> (80) EPPO (13 Sep 2024 6:36 PM) 'Geographical' can be deleted. E.g. "Administrative regions" are not "geographical regions".
48	Planting species and cultivars of trees that are appropriate for the particular geographical region, soil and climatic conditions can reduce plant stress and susceptibility to pests. Planting forests with mixed species rather than using pure stands or clonal trees can reduce the vulnerability of forests to pests.	P	<i>Category : SUBSTANTIVE</i> (13) Colombia (9 Aug 2024 11:23 PM) it is proposed to add a row with the name: "Seed selection" which is considered as a mechanism for risk reduction before planting.

	<u>Seed selection:</u> For the establishment of plantations, it is required to use propagation material and/or seed endorsed by the NPPO, in order to ensure genetic, physical, physiological and phytosanitary quality.		
48	Planting species and cultivars of trees that are appropriate for the particular geographical region, soil and climatic conditions can reduce plant stress and susceptibility to pests. Planting forests with mixed species rather than using <u>pure monoculture</u> stands or clonal trees can reduce the vulnerability of forests to pests.	P	Category : TECHNICAL (3) United States of America (26 Jul 2024 4:23 PM) More appropriate technical term
49	<u>Use of resistant genotypes/cultivars</u>	P	Category : TECHNICAL (4) United States of America (26 Jul 2024 4:24 PM) For consistency used in this Table
50	Planting genotypes that are resistant to certain pests, selected for the environmental conditions of the planting location, pests can reduce infestation.	P	Category : TECHNICAL (219) European Union (27 Sep 2024 12:15 PM) Removed "selected for the environmental conditions of the planting location" as it is superfluous (and already covered by para 47)
50	Planting genotypes that are resistant to certain pests, pests or selected for the environmental conditions of the planting location, can reduce infestation.	P	Category : EDITORIAL (176) Canada (19 Sep 2024 8:09 PM)
50	Planting genotypes that are resistant to certain pests, selected for the environmental conditions of the planting location, pests can reduce infestation.	P	Category : TECHNICAL (81) EPPO (13 Sep 2024 6:36 PM) Removed "selected for the environmental conditions of the planting location" as it is superfluous (and already covered by para 47)
50	Planting genotypes/cultivars that are resistant to certain pests, selected for the environmental conditions of the planting location, can reduce infestation.	P	Category : TECHNICAL (5) United States of America (26 Jul 2024 4:24 PM) For consistency within the table.
51	Pest free areas or areas <u>Areas</u> of low pest prevalence (section 2.5 of this standard)	P	Category : SUBSTANTIVE (322) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM)
51	Pest free areas/areas, pest free places of production, pest free production sites or areas of low pest prevalence (section 2.5 of this standard)	P	Category : SUBSTANTIVE (220) European Union (27 Sep 2024 12:17 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
51	Pest free areas/areas, pest free places of production, pest free production sites, or areas of low pest prevalence (section 2.5 of this standard)	P	Category : SUBSTANTIVE (82) EPPO (13 Sep 2024 6:36 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
51	Pest free areas or areas of low pest prevalence (section 2.5 of this standard) <u>Natural forest areas</u>	P	Category : SUBSTANTIVE (15) Colombia (9 Aug 2024 11:28 PM) It is proposed to add a row with the name: "Natural forest areas" which

			is considered as a mechanism for risk reduction before planting.
52	Pest risk can be reduced by establishing pest free areas or areas of low pest prevalence as described in ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>) and ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>).	P	Category : SUBSTANTIVE (323) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM) Pest free areas are stand alone and not needed as a part of systems approach
52	Pest risk can be reduced by establishing pest free areas <u>areas, pest free places of production, pest free production sites</u> or areas of low pest prevalence as described in ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>) and ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>).	P	Category : SUBSTANTIVE (221) European Union (27 Sep 2024 12:24 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
52	Pest risk can be reduced by establishing pest free areas <u>areas, pest free places of production, pest free production sites</u> or areas of low pest prevalence as described in ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>) and ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>).	P	Category : SUBSTANTIVE (83) EPPO (13 Sep 2024 6:36 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
52	Pest risk can be reduced by establishing pest free areas or areas of low pest prevalence as described in ISPM 4 (<i>Requirements for the establishment of pest free areas</i>), ISPM 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>) and ISPM 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>). Natural forest areas: <u>The conservation of natural forest relicts within forest plantations is a pest management strategy by providing ecological niches for the establishment of biological controllers.</u>	P	Category : SUBSTANTIVE (16) Colombia (9 Aug 2024 11:29 PM) It is proposed to add a row with the name: "Areas of natural forest" which is considered as a mechanism for risk reduction before planting
55	Planning and operational practices that can result in pest risk reduction may be applied to both planted and naturally regenerated forests. Post-planting assessments may be conducted to regularly review the progress of planted seedlings. Pruning may be carried out to remove unhealthy or infested branches. Thinning may be used to improve spacing, reduce competition and improve <u>plant-tree</u> health. Similarly, roguing (routine removal of trees that exhibit <u>show</u> evidence of pest infestation, off-type characteristics or undesirable traits) reduces pest levels <u>incidence</u> , improves harvest quality and reduces the risk of exporting infested wood. Well-planned and managed forests provide an opportunity to improve and monitor tree health while optimizing timber production.	P	Category : EDITORIAL (222) European Union (27 Sep 2024 12:29 PM) Possibly "show evidence" or "show symptoms" are more appropriate terms. More precise words.
55	Planning and operational practices that can result in pest risk reduction may be applied to both planted and naturally regenerated forests. Post-planting assessments may be conducted to regularly review the progress of planted seedlings. <u>General hygiene practices to reduce pest risk should be part of the SA , for example pruning.</u>	P	Category : SUBSTANTIVE (193) PPPO (24 Sep 2024 5:58 PM) To include the concept of general hygiene for SA.

	Pruning may be carried out to remove unhealthy or infested branches. Thinning may be used to improve spacing, reduce competition and improve plant health. Similarly, roguing (routine removal of trees that exhibit evidence of pest infestation, off-type characteristics or undesirable traits) reduces pest levels, improves harvest quality and reduces the risk of exporting infested wood. Well-planned and managed forests provide an opportunity to improve and monitor tree health while optimizing timber production. <u>Any equipment used to perform these practices should be cleaned before and after to reduce the risk of pest introduction and spread.</u>		
55	Planning and operational practices that can result in pest risk reduction may be applied to both planted and naturally regenerated forests. Post-planting assessments may be conducted to regularly review the progress of planted seedlings. Pruning may be carried out to remove unhealthy or infested branches. Thinning may be used to improve spacing, reduce competition and improve <u>plant-tree</u> health. Similarly, roguing (routine removal of trees that <u>exhibit evidence showevidence</u> of pest infestation, off-type characteristics or undesirable traits) reduces pest <u>levelsincidence</u> , improves harvest quality and reduces the risk of exporting infested wood. Well-planned and managed forests provide an opportunity to improve and monitor tree health while optimizing timber production.	P	<p><i>Category : EDITORIAL</i></p> <p>(84) EPPO (13 Sep 2024 6:36 PM)</p> <p>Possibly "show evidence" or "show symptoms" are more appropriate terms.</p> <p>More precise words.</p>
55	Planning and operational practices that can result in pest risk reduction may be applied to both planted and naturally regenerated forests. Post-planting assessments may be conducted to regularly review the progress of planted seedlings. Pruning may be carried out to remove unhealthy or infested branches. Thinning may be used to improve spacing, reduce competition and improve plant health. Similarly, roguing (routine removal of trees that exhibit evidence of <u>pest</u> -infestation, off-type characteristics or undesirable traits) reduces pest levels, improves harvest quality and reduces the risk of exporting infested wood. Well-planned and managed forests provide an opportunity to improve and monitor tree health while optimizing timber production.	P	<p><i>Category : TECHNICAL</i></p> <p>(47) COSAVE (26 Aug 2024 5:44 PM)</p> <p>According ISPM 5 infestation is the presence of a living pest, therefore pest infestation is redundant</p>
55	Planning and operational practices that can result in pest risk reduction may be applied to both planted and naturally regenerated forests. Post-planting assessments may be conducted to regularly review the progress of planted seedlings. Pruning may be carried out to remove unhealthy or infested branches. Thinning may be used to improve spacing, reduce competition and improve plant health. Similarly, roguing (routine removal of trees that exhibit evidence of <u>pest</u> -infestation, off-type characteristics or undesirable traits) reduces pest levels, improves harvest quality and reduces the risk of exporting infested wood. Well-planned and managed forests provide an opportunity to improve and monitor tree health while optimizing timber production.	P	<p><i>Category : TECHNICAL</i></p> <p>(20) Uruguay (18 Aug 2024 2:26 AM)</p> <p>Pest infestation is redundant as per ISPM 5 infestation is presence of a living pest</p>
57	Data from field inspections (e.g. observations of pests or signs of pests) may be used to identify infested trees and guide harvest-planning decisions and to help ensure that infested trees are not selected for export. <u>It may also be used to give confidence that the site is free of the pest or that pest prevalence is acceptably low.</u>	P	<p><i>Category : SUBSTANTIVE</i></p> <p>(306) Australia (30 Sep 2024 2:46 PM)</p> <p>Added to provide clarity on the purpose of inspection.</p>
57	Data from field inspections <u>and regular forest inventories</u> (e.g. observations of pests or signs of pests) may be used to identify infested trees and guide harvest-planning decisions and to	P	<p><i>Category : TECHNICAL</i></p> <p>(223) European Union (27 Sep 2024 12:30 PM)</p>

	help ensure that infested trees are not selected for export.		Not only field inspections, but also regular forest inventories should provide valuable information on vitality and growth of trees within a respective forest stand.
57	Data from field inspections and regular forest inventories (e.g. observations of pests or signs of pests) may be used to identify infested trees and guide harvest-planning decisions and to help ensure that infested trees are not selected for export.	P	<i>Category : TECHNICAL</i> (85) EPPO (13 Sep 2024 6:36 PM) Not only field inspections, but also regular forest inventories should provide valuable information on vitality and growth of trees within a respective forest stand.
59	Surveillance may be used in the establishment and recognition of pest free areas and allows for early detection and intervention in case of an event of pest outbreak. <u>It can also be used to provide confidence that pest prevalence within the site is low (e.g. to confirm the efficacy of commercial or pest management practices).</u> Surveillance should be conducted in accordance with ISPM 6 (<i>Surveillance</i>).	P	<i>Category : SUBSTANTIVE</i> (307) Australia (30 Sep 2024 2:48 PM) Added to provide clarity on the purpose of surveillance.
59	Surveillance may be used in the establishment and recognition of pest free areas and allows for early detection and intervention in case of an event of a pest outbreak. Surveillance should be conducted in accordance with ISPM 6 (<i>Surveillance</i>).	P	<i>Category : EDITORIAL</i> (224) European Union (27 Sep 2024 12:34 PM) Simpler.
59	Surveillance may be used in the establishment and recognition of pest free areas and allows for early detection and intervention in case of an event of a pest outbreak. Surveillance should be conducted in accordance with ISPM 6 (<i>Surveillance</i>).	P	<i>Category : EDITORIAL</i> (86) EPPO (13 Sep 2024 6:36 PM) Simpler.
62	Pesticides <u>Application of pesticides</u>	P	<i>Category : EDITORIAL</i> (225) European Union (27 Sep 2024 12:35 PM) For consistency with paragraph 60.
62	Pesticides <u>Application of pesticides</u>	P	<i>Category : EDITORIAL</i> (87) EPPO (13 Sep 2024 6:36 PM) For consistency with paragraph 60.
63	Pesticides may be used to reduce pest population density. <u>Pesticides may be used to reduce pest incidence.</u>	P	<i>Category : TECHNICAL</i> (227) European Union (27 Sep 2024 12:38 PM) The TPG recommended to replace "pest-population density" with "pest incidence" or "pest prevalence" to avoid using a third term in ISPMs (please see paragraph 69 of the TPG December 2023 report).
63	Pesticides may be used to reduce pest-population-pest-population density.	P	<i>Category : EDITORIAL</i> (186) Canada (20 Sep 2024 9:25 PM)
63	Pesticides may be used to reduce pest-population-pest incidence density.	P	<i>Category : TECHNICAL</i> (88) EPPO (13 Sep 2024 6:36 PM) The TPG recommended to replace "pest-population density" with "pest incidence" or "pest prevalence" to avoid using a third term in ISPMs (please see paragraph 69 of the TPG December 2023 report).
63	Pesticides may be used to reduce pest-population density .	P	<i>Category : TECHNICAL</i> (48) COSAVE (26 Aug 2024 5:45 PM) For consistency

63	Pesticides may be used to reduce pest-population-pest-population density .	P	Category : TECHNICAL (21) Uruguay (18 Aug 2024 2:27 AM) For consistency
65	Biological control agents may be used to reduce pest-population-density <u>pest incidence</u> .	P	Category : TECHNICAL (226) European Union (27 Sep 2024 12:36 PM) The TPG recommended to replace "pest-population density" with "pest incidence" or "pest prevalence" to avoid using a third term in ISPMs (please see paragraph 69 of the TPG December 2023 report).
65	Biological control agents may be used to reduce pest-population-density <u>pest incidence</u> .	P	Category : TECHNICAL (89) EPPO (13 Sep 2024 6:36 PM) The TPG recommended to replace "pest-population density" with "pest incidence" or "pest prevalence" to avoid using a third term in ISPMs (please see paragraph 69 of the TPG December 2023 report).
65	Biological control agents may be used to reduce pest-population density .	P	Category : TECHNICAL (49) COSAVE (26 Aug 2024 5:45 PM) For consistency
65	Biological control agents may be used to reduce pest-population density .	P	Category : TECHNICAL (22) Uruguay (18 Aug 2024 2:27 AM) For consistency
66	Pest free areas or areas <u>Areas</u> of low pest prevalence (section 2.5 of this standard)	P	Category : SUBSTANTIVE (324) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM)
66	Pest free areas <u>areas, pest free places of production, pest free production sites</u> or areas of low pest prevalence (section 2.5 of this standard)	P	Category : TECHNICAL (228) European Union (27 Sep 2024 12:39 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
66	Pest free areas , <u>pest free places of production, pest free production sites</u> , or areas of low pest prevalence (section 2.5 of this standard)	P	Category : TECHNICAL (90) EPPO (13 Sep 2024 6:36 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
67	To confirm the maintenance of a pest free an area or area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	P	Category : SUBSTANTIVE (325) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM)
67	To confirm the maintenance of a pest free area <u>area, pest free places of production, pest free production sites</u> or area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	P	Category : TECHNICAL (230) European Union (27 Sep 2024 12:41 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
67	To confirm the maintenance of a pest free area or area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas),	C	Category : EDITORIAL (229) European Union (27 Sep 2024 12:40 PM)

	ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).		In paragraph 52, full names of ISPM are given, and it seems to be a better option. However as full names of ISPMs are given only once in a standard, we suggest to write simply "in accordance with ISPM 4, ISPM 10 or ISPM 22".
67	To confirm the maintenance of a pest free area or area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	C	<i>Category : EDITORIAL</i> (92) EPPO (13 Sep 2024 6:36 PM) In paragraph 52, full names of ISPM are given, and it seems to be a better option. However as full names of ISPMs are given only once in a standard, we suggest to write simply "in accordance with ISPM 4, ISPM 10 or ISPM 22".
67	To confirm the maintenance of a pest free area <u>pest free place of production, pest free production site</u> , or area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	P	<i>Category : TECHNICAL</i> (91) EPPO (13 Sep 2024 6:36 PM) Addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
67	To confirm the maintenance of a pest free area or area of low pest prevalence, the pest status in the area (<u>ISPM 8</u>) should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	P	<i>Category : TECHNICAL</i> (6) United States of America (26 Jul 2024 4:28 PM) This adds clarity that the pest status itself refers to major categories of "present" and "absent" (see ISPM 8) while ISPMs 4 and ISPM 10 relate to the requirements to meet pest absent status.
70	In some situations, infestation by a particular pest can be reduced by altering the timing of the harvest <u>harvest (e.g. in the year of harvest)</u> . To find out whether this is possible, the risk analyst needs to understand the biology of the pest. Some pests, such as bark beetles and ambrosia beetles, are seasonal in temperate forests. For a seasonal pest, it may be feasible to identify the ideal timing of harvest to reduce levels of attack by the pest and therefore infestation. This may not be possible in tropical forests. In tropical forests, pests can have multiple overlapping generations throughout the year or year-round activity with peak levels of activity in the dry or wet season. The age of the trees at harvest can also be a factor that affects pest levels.	P	<i>Category : SUBSTANTIVE</i> (320) Australia (30 Sep 2024 3:18 PM) Trees may be infested over many seasons, therefore, timing of harvest may only limit infestation in the year of harvest.
70	In some situations, infestation by a particular pest can be reduced by altering the timing of the harvest. To find out whether this is possible, the risk analyst needs to understand the biology of the pest. Some pests, such as bark beetles and ambrosia beetles, <u>ambrosia beetles and longhorn beetles</u> are seasonal in temperate forests. For a seasonal pest, it may be feasible to identify the ideal timing of harvest to reduce levels of attack by the pest and therefore infestation. This may not be possible in tropical forests. In tropical forests, pests can have multiple overlapping generations throughout the year or year-round activity with peak levels of activity in the dry or wet season. The age of the trees at harvest can also be a factor that affects pest levels <u>populations</u> .	P	<i>Category : TECHNICAL</i> (231) European Union (27 Sep 2024 12:44 PM) Removal of "To find out whether this is possible, the risk analyst needs to understand the biology of the pest" – understanding the biology is covered in para 37. Pre-requisites such as this is not covered in any of the other descriptions. Better wording. Simplification and addition of an example.
70	In some situations, infestation by a particular pest can be reduced by altering the timing of the harvest. To find out whether this is possible, the risk analyst needs to understand the biology of the pest. Some pests, such as bark beetles and ambrosia beetles, are seasonal in	P	<i>Category : TECHNICAL</i> (177) Canada (19 Sep 2024 8:12 PM) This sentence doesn't add to the description and wasn't in the first draft

	temperate forests. For a seasonal pest, it may be feasible to identify the ideal timing of harvest to reduce levels of attack by the pest and therefore infestation. This may not be possible in tropical forests. In tropical forests, pests can have multiple overlapping generations throughout the year or year-round activity with peak levels of activity in the dry or wet season. The age of the trees at harvest can also be a factor that affects pest levels.		or first round of country consultation. The following sentences provide ample information. Recommend removing 'To find out whether this is possible...".
70	In some situations, infestation by a particular pest can be reduced by altering the timing of the harvest. To find out whether this is possible, the risk analyst needs to understand the biology of the pest. Some pests, such as bark beetles and ambrosia beetles, are seasonal in temperate forests. For a seasonal pest, it may be feasible to identify the ideal timing of harvest to reduce levels of attack by the pest and therefore infestation. This may not be possible in tropical forests. In tropical forests, pests can have multiple overlapping generations throughout the year or year-round activity with peak levels of activity in the dry or wet season. The age of the trees at harvest can also be a factor that affects pest levels populations.	P	<i>Category : TECHNICAL</i> (93) EPP0 (13 Sep 2024 6:36 PM) Removal of "To find out whether this is possible, the risk analyst needs to understand the biology of the pest" – understanding the biology is covered in para 37. Pre-requisites such as this is not covered in any of the other descriptions. Better wording. Simplification and addition of an example.
70	In some situations, infestation by a particular pest can be reduced by altering the timing of the harvest. To find out whether this is possible, the risk analyst needs to understand the biology of the pest. Some pests, such as bark beetles and ambrosia beetles, are seasonal in temperate forests. For a seasonal pest, it may be feasible to identify the ideal timing of harvest to reduce levels of attack by the pest and therefore infestation. This may not be possible in tropical forests. In tropical forests, pests can have multiple overlapping generations throughout the year or year-round activity with peak levels of activity in the dry or wet season. The age of the trees at harvest can also be a factor that affects pest levels.	C	<i>Category : SUBSTANTIVE</i> (60) APPPC (9 Sep 2024 12:22 PM) New row after "timing of harvest": for selective harvesting. Selective harvesting of healthy trees (e.g. not aged or dead) to reduce infestation level
73	Round wood can be susceptible to infestation after it has been harvested. The season of harvest, the length of time that the round wood remains in the forest after harvesting, and the length of time that it takes to transport the wood to the processing facility or holding yard can influence post-harvest infestation. Rapid removal and timely transport can therefore reduce infestation. In geographical regions where the temperature during harvest, post-harvest, transport and storage is below –15 °C, the cold temperature may reduce the pest risk. This may be considered a treatment during storage.	P	<i>Category : TECHNICAL</i> (232) European Union (27 Sep 2024 12:46 PM) This cannot be considered as a treatment as beetles and larvae can withstand even colder temperatures, but when optimal conditions occur, they will continue their vital activity. And it is better to conduct forest felling (cutting) in the late autumn and winter periods, when there is no insect flights. This can be considered a measure rather than a treatment. Therefore we suggest deleting last sentence. As already noted, 'geographical' can be deleted. E.g. "Administrative regions" are not "geographical regions".
73	Round wood can be susceptible to infestation after it has been harvested. The season of harvest, the length of time that the round wood remains in the forest after harvesting, and the length of time that it takes to transport the wood to the processing facility or holding yard can influence post-harvest infestation. Rapid removal and timely transport can therefore reduce infestation. In geographical regions where the temperature during harvest, post-harvest, transport and storage is below –15 °C, the cold temperature may reduce the pest	P	<i>Category : TECHNICAL</i> (94) EPP0 (13 Sep 2024 6:36 PM) This cannot be considered as a treatment as beetles and larvae can withstand even colder temperatures, but when optimal conditions occur, they will continue their vital activity. And it is better to conduct forest felling (cutting) in the late autumn and winter periods, when there is no insect flights.

	risk. This may be considered a treatment during storage.		This can be considered a measure rather than a treatment. Therefore we suggest deleting last sentence. As already noted, 'geographical' can be deleted. E.g. "Administrative regions" are not "geographical regions".
73	Round wood can be susceptible to infestation after it has been harvested. The season of harvest, the length of time that the round wood remains in the forest after harvesting, and the length of time that it takes to transport the wood to the processing facility or holding yard can influence post-harvest infestation. Rapid removal and timely transport can therefore reduce infestation. In geographical regions where the temperature during harvest, post-harvest, transport and storage is below –15 °C, the cold temperature may reduce the pest risk. This may be considered a treatment during storage.	C	<i>Category : TECHNICAL</i> (158) Canada (18 Sep 2024 3:19 PM) This should be clarified how this linked to the " rapid removal and timely transport of harvested round wood? Or put it as a separate measure.
73	Round wood can be susceptible to infestation after it has been harvested. The season of harvest, the length of time that the round wood remains in the forest after harvesting, and the length of time that it takes to transport the wood to the processing facility or holding yard can influence post-harvest infestation. Rapid removal and timely transport can therefore reduce infestation. Vehicular transportation is used to avoid heavy soil contamination. In geographical regions where the temperature during harvest, post-harvest, transport and storage is below –15 °C, the cold temperature may reduce the pest risk. This may be considered a treatment during storage.	P	<i>Category : SUBSTANTIVE</i> (61) APPPC (9 Sep 2024 12:22 PM) Vehicle transportation can be adopted to avoid a lot of soil contamination.
74	Examination-Visual examination for pests during volume and quality determination	P	<i>Category : TECHNICAL</i> (233) European Union (27 Sep 2024 12:47 PM) Prior version of the ISPM draft annex included the the word 'visual'. 'Visual examination' is defined in ISPM 5.
74	Examination-Visual examination for pests during volume and quality determination	P	<i>Category : TECHNICAL</i> (95) EPPO (13 Sep 2024 6:36 PM) Prior version of the ISPM draft annex included the the word 'visual'. 'Visual examination' is defined in ISPM 5.
75	To reduce the likelihood and/or quantity of infested wood entering the production chain, round wood may be examined for evidence of pests during the process of scaling and grading.	P	<i>Category : SUBSTANTIVE</i> (319) Australia (30 Sep 2024 3:16 PM) Infested material entering the production process should be limited or reduced.
75	To reduce the quantity of infested wood entering the production chain, round wood may be visually examined for evidence of pests during the process of scaling and grading.	P	<i>Category : TECHNICAL</i> (234) European Union (27 Sep 2024 12:48 PM) Prior version of the ISPM draft annex included the the word 'visual'. Only 'visual examination' is defined and included in ISPM 5.
75	To reduce the quantity of infested wood entering the production chain, round wood may be visually examined for evidence of pests during the process of scaling and grading.	P	<i>Category : TECHNICAL</i> (96) EPPO (13 Sep 2024 6:36 PM) Prior version of the ISPM draft annex included the the word 'visual'. Only 'visual examination' is defined and included in ISPM 5.
77	Anti-aggregation pheromones Repellants, if available, may be used to repel pests from	P	<i>Category : TECHNICAL</i>

	places of natural disturbance (e.g. windthrows) or logging and storage areas.		(235) European Union (27 Sep 2024 12:49 PM) Anti-aggregation pheromones are natural. It seems that here synthesized repellents are meant. It is not the same.
77	Anti-aggregation pheromones Repellants , if available, may be used to repel pests from places of natural disturbance (e.g. windthrows) or logging and storage areas.	P	<i>Category : TECHNICAL</i> (97) EPPO (13 Sep 2024 6:36 PM) Anti-aggregation pheromones are natural. It seems that here synthesized repellents are meant. It is not the same.
79	Protection of round wood after harvest (e.g. storing in water, sprinkling with water, insect nets nets , <u>application of plant protection products</u>) may be used to prevent post-harvest infestations by bark beetles and wood borers.	P	<i>Category : TECHNICAL</i> (236) European Union (27 Sep 2024 12:52 PM) Proposed addition of an example.
79	Protection of round wood after harvest (e.g. storing in water, sprinkling with water, insect nets nets , <u>application of plant protection products</u>) may be used to prevent post-harvest infestations by bark beetles and wood borers.	P	<i>Category : TECHNICAL</i> (98) EPPO (13 Sep 2024 6:36 PM) Proposed addition of an example.
81	Removal of bark substantially reduces the number of pests inhabiting the outer surface and those found directly beneath the bark. Bark removal can <u>also</u> prevent post-harvest infestation by some wood-pest species.	P	<i>Category : EDITORIAL</i> (237) European Union (27 Sep 2024 12:55 PM) Clearer and for consistency with paragraph 90.
81	Removal of bark substantially reduces the number of pests inhabiting the outer surface and those found directly beneath the bark. Bark removal can prevent post-harvest infestation by some wood-pest pest species.	P	<i>Category : TECHNICAL</i> (159) Canada (18 Sep 2024 3:20 PM)
81	Removal of bark substantially reduces the number of pests inhabiting the outer surface and those found directly beneath the bark. Bark removal can <u>also</u> prevent post-harvest infestation by some wood-pest species.	P	<i>Category : EDITORIAL</i> (99) EPPO (13 Sep 2024 6:36 PM) Clearer and for consistency with paragraph 90.
81	<u>Removal of bark substantially reduces the number of pests inhabiting the outer surface and those found directly beneath the bark. Bark removal can prevent post-harvest infestation by some wood-pest species.</u>	C	<i>Category : TECHNICAL</i> (32) South Africa (20 Aug 2024 1:56 PM) Insertion: The pest risk associated with bark varies due to factors such as tree species, the presence of pests in the original material, and the time of year or life cycle of the pests. Bark can Harbor pests and their life stages, increasing the potential for pest introduction and spread. However, the necessity of bark removal depends on the specific pest risk assessment, which considers these factors along with the intended use of the wood. The decision to remove bark should therefore be based on a comprehensive pest risk assessment. By adopting a risk-based approach, it is possible to effectively manage pest risks while accommodating different operational practices and international trade requirements.
82	Removal of branches (or boughs)	C	<i>Category : TECHNICAL</i> (31) South Africa (20 Aug 2024 1:54 PM) Proposal for addition of "Removal of bark should be based on the risk assessment" in paragraph 81.
83	Branch (or bough) removal can be an effective method to reduce infestation by pests of foliage and twigs, <u>thus</u> preventing the movement of those pests.	P	<i>Category : EDITORIAL</i> (238) European Union (27 Sep 2024 12:57 PM)

			Clearer.
83	Branch (or bough) removal can be an effective method to reduce infestation by pests of foliage and twigs, <u>thus</u> preventing the movement of those pests.	P	Category : EDITORIAL (100) EPPO (13 Sep 2024 6:36 PM) Clearer.
84	Washing or water blasting	P	Category : SUBSTANTIVE (239) European Union (27 Sep 2024 12:58 PM) Would fit better under processing and treatment.
84	Washing or water blasting	P	Category : SUBSTANTIVE (101) EPPO (13 Sep 2024 6:36 PM) Would to fit better under processing and treatment.
85	Washing or water blasting can remove pests and soil.	P	Category : SUBSTANTIVE (240) European Union (27 Sep 2024 1:00 PM) Would seem to fit better under processing and treatment.
85	Washing or water blasting can remove pests and soil.	P	Category : SUBSTANTIVE (102) EPPO (13 Sep 2024 6:36 PM) Would seem to fit better under processing and treatment.
86	Processing and treatment	C	Category : SUBSTANTIVE (241) European Union (27 Sep 2024 1:03 PM) We propose to add in this table what we proposed to remove above i.e. the washing or water blasting from the the above section. The table of measures seems to imply a chronological order along the production chain from pre-planting to the final product. This causes a problem in the sections "post-harvest" and "processing and treatment" because the section post-harvest seems to imply that these are post-harvest measures of wood still in the forest while "processing and treatment" seems to imply that this section relates to wood already removed from the forest. Certain measures in the "post-harvest" section could (also) be applied as processing and treatment. We would like to suggest to make this more clear in the table, either by repeating the relevant measures in both section or mark these measures with a footnote explaining that they are relevant for more than one section or by clarifying the heading of the sections.
86	Processing and treatment	C	Category : SUBSTANTIVE (103) EPPO (13 Sep 2024 6:36 PM) We propose to add in this table what we proposed to remove above i.e. the washing or water blasting from the the above section. The table of measures seems to imply a chronological order along the production chain from pre-planting to the final product. This causes a problem in the sections "post-harvest" and "processing and treatment" because the section post-harvest seems to imply that these are post-

			harvest measures of wood still in the forest while "processing and treatment" seems to imply that this section relates to wood already removed from the forest. Certain measures in the "post-harvest" section could (also) be applied as processing and treatment. We would like to suggest to make this more clear in the table, either by repeating the relevant measures in both section or mark these measures with a footnote explaining that they are relevant for more than one section or by clarifying the heading of the sections.
88	Rapid processing of wood after harvest can reduce the risk of post-harvest infestation.	P	<i>Category : SUBSTANTIVE</i> (308) Australia (30 Sep 2024 2:49 PM) Clarity around what is reduced.
90	Removal of bark substantially reduces the number of pests inhabiting the outer surface and those found directly beneath the bark. Bark removal can also prevent post-harvest infestation by some wood-post pest species.	P	<i>Category : TECHNICAL</i> (160) Canada (18 Sep 2024 3:20 PM) See above
91	Sawing and planing wood (section 1.2 of this standard)	C	<i>Category : EDITORIAL</i> (8) Ecuador (1 Aug 2024 7:07 PM) Mistake in word planing, should be planning
92	Sawing removes most of Depending on the bark as well as some of the outer wood incision model used, eliminating pests living in or just under the bark. Sawn wood with rounded edges resulting from sawing removes most of the bark as well as some of the outer wood, eliminating pests living in or just under the bark. Sawn wood with rounded edges resulting from the curvature of the round wood poses a greater pest risk than square-edged sawn wood, as a larger percentage of the wood just below the surface of the bark is included. The process of sawing wood can destroy insect pests present in the wood and render it less suitable for pest survival. The presence or absence of bark and the thickness of a piece of sawn wood affect pest risk. Planing reduces the dimensions of sawn wood and may be used to remove residual bark.	P	<i>Category : TECHNICAL</i> (242) European Union (27 Sep 2024 1:05 PM) If a trunk is cut into thick planks, this does not automatically remove large parts of the bark.
92	Sawing removes most of the bark as well as some of the outer wood, eliminating pests living in or just under the bark. Sawn wood with rounded edges resulting from the curvature of the round wood poses a greater pest risk than square-edged sawn wood, as a larger percentage of the wood just below the surface of the bark is included. The process of sawing wood can destroy remove insect pests present in the wood and render it less suitable for pest survival. The presence or absence of bark and the thickness of a piece of sawn wood affect pest risk. Planing reduces the dimensions of sawn wood and may be used to remove residual bark.	P	<i>Category : TECHNICAL</i> (187) Canada (20 Sep 2024 9:31 PM) Sawing removes pests from the certain portions of the wood
92	Sawing removes most of the bark as well as some of the outer wood, eliminating pests living in or just under the bark. Sawn wood with rounded edges resulting from the curvature of the round wood poses a greater pest risk than square-edged sawn wood, as a larger percentage of the wood just below the surface of the bark is included. The process of sawing wood can destroy insect pests present in the wood and render it less suitable for	P	<i>Category : TECHNICAL</i> (161) Canada (18 Sep 2024 3:24 PM) Is this true? We've seen low grade economy sawn wood with plenty of bark.

	pest survival. The presence or absence of bark and the thickness of a piece of sawn wood affect pest risk. Planing reduces the dimensions of sawn wood and may be used to remove residual bark.		
92	<u>Sawing removes</u> Depending on the incision model used, sawing may remove most of the bark as well as some of the outer wood, eliminating pests living in or just under the bark. Sawn wood with rounded edges resulting from the curvature of the round wood poses a greater pest risk than square-edged sawn wood, as a larger percentage of the wood just below the surface of the bark is included. The process of sawing wood can destroy insect pests present in the wood and render it less suitable for pest survival. The presence or absence of bark and the thickness of a piece of sawn wood affect pest risk. Planing reduces the dimensions of sawn wood and may be used to remove residual bark.	P	Category : <i>TECHNICAL</i> (104) EPPO (13 Sep 2024 6:36 PM) If a trunk is cut into thick planks, this does not automatically remove large parts of the bark.
92	Sawing removes most of the bark as well as some of the outer wood, eliminating pests living in or just under the bark. Sawn wood with rounded edges resulting from the curvature of the round wood poses a greater pest risk than square-edged sawn wood, as a larger percentage of the wood just below the surface of the bark is included. The process of sawing wood can destroy insect pests present in the wood and render it less suitable for pest survival. The presence or absence of bark and the thickness of a piece of sawn wood affect pest risk. Planing reduces the dimensions of sawn wood and may be used to remove residual bark.	C	Category : <i>EDITORIAL</i> (9) Ecuador (1 Aug 2024 7:08 PM) Mistake in word planing, should be planning
97	Pest free <u>areas</u> areas, pest free places of production, pest free production sites or areas of low pest prevalence (section 2.5 of this standard)	P	Category : <i>TECHNICAL</i> (243) European Union (27 Sep 2024 1:06 PM) As in paragraph 66, addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
97	Pest free <u>areas</u> areas, pest free places of production, pest free production sites or areas of low pest prevalence (section 2.5 of this standard)	P	Category : <i>TECHNICAL</i> (105) EPPO (13 Sep 2024 6:36 PM) As in paragraph 66, addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.
98	Pest risk can be reduced by processing wood commodities in pest free <u>areas</u> areas, pest free production place, pest free site of production or areas of low pest prevalence, while taking all precautionary measures not to introduce the pest in the pest free area, pest free place of production, pest free production site or the area of low . To confirm the maintenance of a pest free area or an area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	P	Category : <i>SUBSTANTIVE</i> (245) European Union (27 Sep 2024 1:17 PM) This addition draws the attention on being precautionous not to jeopardize the pest free status of a PFA by processing woods not coming from a PFA.
98	Pest risk can be reduced by processing wood commodities in pest free <u>areas</u> areas, pest free places of production, pest free production sites or areas of low pest prevalence. To confirm the maintenance of a pest free area or an area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for	P	Category : <i>TECHNICAL</i> (244) European Union (27 Sep 2024 1:11 PM) As in paragraph 66, addition of pest free places of production and pest free production sites, as reference to ISPM 10 has now been included.

	areas of low pest prevalence).		As commented on paragraph 67, the whole wording of ISPM titles seems to be a better option. However as full names of ISPMs are given only once in a standard, we suggest to write simply "in accordance with ISPM 4, ISPM 10 or ISPM 22".
98	Pest risk can be reduced by processing wood commodities in pest free areas or areas of low pest prevalence. To confirm the maintenance of a pest free area or an area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	C	<i>Category : EDITORIAL</i> (107) EPPO (13 Sep 2024 6:36 PM) As commented on paragraph 67, the whole wording of ISPM titles seems to be a better option. However as full names of ISPMs are given only once in a standard, we suggest to write simply "in accordance with ISPM 4, ISPM 10 or ISPM 22".
98	Pest risk can be reduced by processing wood commodities in pest free areas or areas of low pest <u>prevalence while taking all precautionary measures not to introduce the pest in the pest free area or the area of low</u> prevalence. To confirm the maintenance of a pest free area or an area of low pest prevalence, the pest status in the area should be verified in accordance with ISPM 4 (for pest free areas), ISPM 10 (for pest free places of production and pest free production sites) or ISPM 22 (for areas of low pest prevalence).	P	<i>Category : SUBSTANTIVE</i> (106) EPPO (13 Sep 2024 6:36 PM) This addition draws the attention on being precautionous not to jeopardize the pest free status of a PFA by processing woods not coming from a PFA.
99	<u>SurveillanceTrapping</u>	P	<i>Category : SUBSTANTIVE</i> (246) European Union (27 Sep 2024 1:18 PM) Replaced "surveillance" with "trapping" as a more accurate description of the measure. Surveillance is carried out in an area not just a storage and processing facility
99	<u>SurveillanceTrapping</u>	P	<i>Category : SUBSTANTIVE</i> (108) EPPO (13 Sep 2024 6:36 PM) Replaced "surveillance" with "trapping" as a more accurate description of the measure. Surveillance is carried out in an area not just a storage and processing facility
100	Surveillance using traps may be conducted within and around a storage and processing <u>facilityfacility to give confidence that the site is free of the pest or that pest prevalence is acceptably low</u> . Surveillance should be conducted in accordance with ISPM 6.	P	<i>Category : SUBSTANTIVE</i> (309) Australia (30 Sep 2024 2:51 PM) Added to provide clarity around the purpose of surveillance.
100	<u>Surveillance using traps-Trapping</u> may be conducted within and around a storage and processing facility, <u>allowing for early detection of a pest</u> . <u>Surveillance should be conducted in accordance with ISPM 6.</u>	P	<i>Category : TECHNICAL</i> (247) European Union (27 Sep 2024 1:27 PM) Edited in line with European Union comment #246. Also no need to ref ISPM 6.
100	<u>Surveillance using traps-Trapping</u> may be conducted within and around a storage and processing <u>facilityfacility allowing for early detection of a pest</u> . <u>Surveillance should be conducted in accordance with ISPM 6.</u>	P	<i>Category : TECHNICAL</i> (109) EPPO (13 Sep 2024 6:36 PM) Edited in line with EPPO comment #82. Also no need to ref ISPM 6.
102	Lighting used in storage areas can be very attractive to <u>some</u> wood pests. Use of lighting frequencies that are less attractive to wood pests or push-pull lighting to divert pests can reduce infestation.	P	<i>Category : EDITORIAL</i> (248) European Union (27 Sep 2024 1:28 PM) Clearer
102	Lighting used in storage areas can be very attractive to <u>some</u> wood pests. Use of lighting frequencies that are less attractive to wood pests or push-pull lighting to divert pests can	P	<i>Category : EDITORIAL</i> (110) EPPO (13 Sep 2024 6:36 PM)

	reduce infestation.		Clearer.
102	Lighting used in storage areas can be very attractive to wood pests. Use of lighting frequencies that are less attractive to wood pests or push-pull lighting to divert pests can reduce infestation.	C	Category : TECHNICAL (10) Ecuador (1 Aug 2024 7:24 PM) It could be recommended that any manipulation of the wood be done in natural light, during the day, since artificial light can attract insect pests.
104	Visual examination may be used to identify specific signs or symptoms of pests and determine if measures applied have been effective. The size and disposition of the wood commodities and the cryptic nature of some pests can, however, make visual examination challenging challenging or not effective.	P	Category : TECHNICAL (249) European Union (27 Sep 2024 1:30 PM) More precise
104	Visual examination may be used to identify specific signs or symptoms of pests and determine if measures applied have been effective. The size and disposition of the wood commodities and the cryptic nature of some pests can, however, make visual examination challenging challenging or not effective.	P	Category : TECHNICAL (111) EPPO (13 Sep 2024 6:36 PM) More precise.
109	Heat treatment involves heating wood to kill, or otherwise cause sublethal effects. Heat treatment does not necessarily involve moisture reduction. Types of heat treatments include, but are not limited to, steam steam sterilization, hot-water bath and vacuum-steam heating, kiln-heating, solar heating, joule heating and dielectric (microwave or radio-frequency) heating.	P	Category : TECHNICAL (194) PPPO (24 Sep 2024 5:58 PM) To explain the purpose of the steam treatment.
109	Heat treatment involves heating wood to kill, or otherwise cause sublethal effects. Heat treatment does not necessarily involve moisture reduction. Types of heat treatments include, but are not limited to, steam, hot-water bath and vacuum-steam heating, kiln-heating, solar heating, joule heating and dielectric (microwave or radio-frequency) heating.	C	Category : TECHNICAL (42) Sri Lanka (22 Aug 2024 7:51 AM) propose to add gradual reduction of moisture instead of moisture reduction
110	Technical Establishment of technical standards for heat treatment schedules should be established and approval of facilities approved by NPPOs should be in accordance with ISPM 42 (in accordance with ISPM 42 (Requirements for the use of temperature treatments as phytosanitary measures).	P	Category : EDITORIAL (162) Canada (18 Sep 2024 3:26 PM)
111	Air-drying (section 2.2 of this standard) Air-drying	P	Category : EDITORIAL (204) Japan (26 Sep 2024 9:59 AM)
112	Air-drying wood to the equilibrium moisture content can prevent some pests from completing their life cycle and make it unattractive for some pests, because of the reduction in moisture content content (see Appendix 2 of this standard).	P	Category : EDITORIAL (180) Japan (20 Sep 2024 5:54 AM)
113	Kiln-drying (section 2.2 of this standard)	P	Category : EDITORIAL (250) European Union (27 Sep 2024 1:31 PM) Why this reference?
113	Kiln-drying (section 2.2 of this standard)	C	Category : SUBSTANTIVE (195) PPPO (24 Sep 2024 5:58 PM) To check if there is any information on moisture content, perhaps in international guidelines (e.g. like we would reference IAEA for irradiation).

113	Kiln-drying (section 2.2 of this standard) <u>Kiln-drying</u>	P	Category : EDITORIAL (181) Japan (20 Sep 2024 5:54 AM)
113	Kiln-drying (section 2.2 of this standard) <u>Kiln-drying</u>	P	Category : EDITORIAL (112) EPPO (13 Sep 2024 6:36 PM) Why this reference?
114	Kiln-drying can prevent some pests from completing their life cycle in wood commodities, because of the heat exposure and reduction in moisture content. <u>content (see Appendix 2 of this standard).</u>	P	Category : EDITORIAL (182) Japan (20 Sep 2024 5:54 AM)
115	<u>Irradiation (section 2.2 of this standard)</u>	C	Category : SUBSTANTIVE (196) PPPO (24 Sep 2024 5:58 PM) To check if there is any information on moisture content, perhaps in international guidelines (e.g. like we would reference IAEA for irradiation). - Same as above.
119	Spraying or dipping <u>dipping (section 2.2 of this standard)</u>	P	Category : EDITORIAL (251) European Union (27 Sep 2024 1:33 PM) For consistency with the rest of the table (please also see the related comment on paragraph 120).
119	Spraying or dipping <u>dipping (section 2.2 of this standard)</u>	P	Category : EDITORIAL (183) Japan (20 Sep 2024 5:56 AM)
119	Spraying or dipping <u>dipping (section 2.2 of this standard)</u>	P	Category : EDITORIAL (113) EPPO (13 Sep 2024 6:36 PM) For consistency with the rest of the table (please also see the related comment on paragraph 120).
120	Wood commodities may be treated with anti-fungal sap-stain chemical spray or dips to prevent the growth of stain fungi on logs or sawn wood (see Appendix 2 of this standard) <u>wood.</u>	P	Category : EDITORIAL (252) European Union (27 Sep 2024 4:19 PM) For consistency with the rest of the table (please also see the related comment on paragraph 119).
120	Wood commodities may be treated with anti-fungal sap-stain chemical spray or dips to prevent the growth of stain fungi on logs or sawn wood (see Appendix 2 of this standard) <u>wood.</u>	P	Category : EDITORIAL (114) EPPO (13 Sep 2024 6:36 PM) For consistency with the rest of the table (please also see the related comment on paragraph 119).
122	Wood commodities may be exposed to a modified atmosphere as a pest risk reduction measure (see Appendix 2 of this standard) <u>measure.</u> Modified atmosphere treatment should be applied in accordance with ISPM 44 (<i>Requirements for the use of modified atmosphere treatments as phytosanitary measures</i>).	P	Category : EDITORIAL (253) European Union (27 Sep 2024 4:20 PM) To be deleted for consistency with the rest of the table, because it is now included in the left column, paragraph 121, through the wording: "(section 2.2 of this standard)".
122	Wood commodities may be exposed to a modified atmosphere as a pest risk reduction measure (see Appendix 2 of this standard) <u>measure.</u> Modified atmosphere treatment should be applied in accordance with ISPM 44 (<i>Requirements for the use of modified atmosphere</i>	P	Category : EDITORIAL (115) EPPO (13 Sep 2024 6:36 PM) To be deleted for consistency with the rest of the table, because it is now

	<i>treatments as phytosanitary measures).</i>		included in the left column, paragraph 121, through the wording: "(section 2.2 of this standard)".
127	Wood commodities may be segregated or stored in a manner designed to prevent infestation. This may be achieved by covering, containerizing <u>containerization</u> , or storing in buildings where pheromone traps are deployed.	P	<i>Category : EDITORIAL</i> (56) Philippines (4 Sep 2024 2:14 AM)
129	Keeping storage areas <u>clean and</u> free from pests, wood debris and soil can help to prevent infestation of commodities and may therefore be included as a component of a systems approach.	P	<i>Category : SUBSTANTIVE</i> (313) Australia (30 Sep 2024 3:02 PM) Cleanliness will assist with keeping pests, wood, debris and soil from contaminating the product.
129	Keeping storage areas free from pests, wood debris and soil can help to prevent infestation of commodities and may therefore be included as a component of a systems approach <u>commodities</u> .	P	<i>Category : EDITORIAL</i> (254) European Union (27 Sep 2024 4:22 PM) This can be deleted because it is true for all the measures included in the table.
129	Keeping storage areas free from pests, wood debris and soil can help to prevent infestation of commodities and may therefore be included as a component of a systems approach .	P	<i>Category : TECHNICAL</i> (163) Canada (18 Sep 2024 3:28 PM) Not necessary to include this second part
129	Keeping storage areas free from pests, wood debris and soil can help to prevent infestation of commodities and may therefore be included as a component of a systems approach <u>commodities</u> .	P	<i>Category : EDITORIAL</i> (116) EPPO (13 Sep 2024 6:36 PM) This can be deleted because it is true for all the measures included in the table.
131	A storage enclosure can be very effective at protecting wood commodities from infestation before dispatch. As contact with the ground can risk commodities becoming infested with soil-borne pests, storing commodities on cement pads or raised platforms can be beneficial. Surveillance, or regular <u>Regular</u> checks for pests combined with measures to prevent or deter pests (e.g. host removal, reduction or altering of facility lighting, pesticide application, use of nets (including those treated with insecticide), wrapping in protective material), may be used to protect wood commodities during storage and loading.	P	<i>Category : SUBSTANTIVE</i> (255) European Union (27 Sep 2024 4:24 PM) Removal of surveillance, as it is not appropriate wording in this case.
131	A storage enclosure can be very effective at protecting wood commodities from infestation before dispatch. As contact with the ground can risk commodities becoming infested with soil-borne pests, storing commodities on cement pads or raised platforms can be beneficial. Surveillance, or regular <u>Regular</u> checks for pests combined with measures to prevent or deter pests (e.g. host removal, reduction or altering of facility lighting, pesticide application, use of nets (including those treated with insecticide), wrapping in protective material), may be used to protect wood commodities during storage and loading.	P	<i>Category : SUBSTANTIVE</i> (117) EPPO (13 Sep 2024 6:36 PM) Removal of surveillance, as it is not appropriate wording in this case.
133	Round wood may be sprinkled with water in storage areas (where appropriate) to reduce insect or prevent pest infestation and water pressure-washing may be used to remove pests, soil and debris.	P	<i>Category : TECHNICAL</i> (256) European Union (27 Sep 2024 4:25 PM) Precision added and simplification
133	Round wood may be sprinkled with water in storage areas (where appropriate) to reduce insect or prevent pest infestation and water pressure-washing may be used to remove pests, soil and debris.	P	<i>Category : TECHNICAL</i> (118) EPPO (13 Sep 2024 6:36 PM) Precision added and simplification

134	Timing of dispatch	P	<p>Category : <i>SUBSTANTIVE</i></p> <p>(259) European Union (27 Sep 2024 4:29 PM)</p> <p>Move to transport section, as it is about dispatch not pre-dispatch.</p> <p>Removed "The timing of dispatch should be based on biological data and technical justification" as it is unnecessary and this type of information has not been included for all the other measures.</p>
134	Timing of dispatch	P	<p>Category : <i>SUBSTANTIVE</i></p> <p>(119) EPPO (13 Sep 2024 6:36 PM)</p> <p>Move to transport section, as it is about dispatch not pre-dispatch.</p> <p>Removed "The timing of dispatch should be based on biological data and technical justification" as it is unnecessary and this type of information has not been included for all the other measures.</p>
135	Dispatching wood commodities only when pests are inactive and applying a pest risk reduction measure upon arrival in the importing country inactive can be effective in reducing pest risk. The timing of dispatch should be based on biological data and technical justification.	P	<p>Category : <i>SUBSTANTIVE</i></p> <p>(260) European Union (27 Sep 2024 4:36 PM)</p> <p>Does this really belong to the pre-import section of Table 1?</p> <p>We propose deleting some parts.</p> <p>Removed "The timing of dispatch should be based on biological data and technical justification" as it is unnecessary and this type of information has not been included for all the other measures.</p>
135	Dispatching wood commodities only when pests are inactive and applying a pest risk reduction measure upon arrival in the importing country can be effective in reducing pest risk. The timing of dispatch should be based on biological data and technical justification <u>justification (e.g. low-risk season vs high risk season).</u>	P	<p>Category : <i>TECHNICAL</i></p> <p>(165) Canada (18 Sep 2024 3:31 PM)</p> <p>Give an example</p>
135	Dispatching wood commodities only when pests are inactive and applying a pest risk reduction measure upon arrival in the importing country inactive can be effective in reducing pest risk. The timing of dispatch should be based on biological data and technical justification.	P	<p>Category : <i>TECHNICAL</i></p> <p>(164) Canada (18 Sep 2024 3:29 PM)</p> <p>Not necessary to include this second part here</p>
135	Dispatching wood commodities only when pests are inactive and applying a pest risk reduction measure upon arrival in the importing country can be effective in reducing pest risk. The timing of dispatch should be based on biological data and technical justification.	P	<p>Category : <i>SUBSTANTIVE</i></p> <p>(120) EPPO (13 Sep 2024 6:36 PM)</p> <p>Does this really belong to Table 1 which is about pre-import measures?</p> <p>We propose deleting some parts.</p> <p>Removed "The timing of dispatch should be based on biological data and technical justification" as it is unnecessary and this type of information has not been included for all the other measures.</p>
135	Dispatching wood commodities only when pests are inactive and applying a pest risk reduction measure upon arrival in the importing country can be effective in reducing pest risk. The timing of dispatch should <u>may</u> be based on biological data and technical justification.	P	<p>Category : <i>TECHNICAL</i></p> <p>(62) APPPC (9 Sep 2024 12:22 PM)</p> <p>For forests in countries or regions in the tropics and subtropics, pests may have multiple generations overlapping throughout the year, or may</p>

			be active throughout the year. This condition does not apply to exporting countries located in any of these regions and is not conducive to the global import and export trade in timber commodities.
135	Dispatching wood commodities only when pests are inactive and applying a pest risk reduction measure upon arrival in the importing country can be effective in reducing pest risk. The timing of dispatch should be based on biological data and technical justification.	C	<i>Category : TECHNICAL</i> (43) Sri Lanka (22 Aug 2024 8:02 AM) propose to add biological data of wood pest
137	Outer-In the outer perimeter of the storage area, push-pull systems with anti-aggregation and aggregation pheromones and traps may be used to verify pest presence or absence in a storage area and to manage some insect pests. With NPPO oversight, this may be considered surveillance and should be conducted in accordance with ISPM 6.	P	<i>Category : SUBSTANTIVE</i> (261) European Union (27 Sep 2024 4:38 PM) Removal of the sentence on surveillance. It doesn't seem appropriate for a storage area. To be more precise.
137	Outer-In the outer perimeter of the storage area, push-pull systems with anti-aggregation and aggregation pheromones and traps may be used to verify pest presence or absence in a storage area and to manage some insect pests. With NPPO oversight, this may be considered surveillance and should be conducted in accordance with ISPM 6.	P	<i>Category : SUBSTANTIVE</i> (121) EPPO (13 Sep 2024 6:36 PM) Removal of the sentence on surveillance. It doesn't seem appropriate for a storage area. To be more precise.
140	Pre-dispatch sampling and inspection (section 2.4 of this standard)	P	<i>Category : SUBSTANTIVE</i> (262) European Union (27 Sep 2024 4:38 PM) Removed sampling, as this is covered by 144 and 145.
140	Pre-dispatch sampling and inspection (section 2.4 of this standard)	P	<i>Category : SUBSTANTIVE</i> (122) EPPO (13 Sep 2024 6:36 PM) Removed sampling, as this is covered by 144 and 145.
141	To ensure that the phytosanitary import requirements of the importing country are met, sampling and inspection may be conducted at various points within a systems approach.	P	<i>Category : SUBSTANTIVE</i> (263) European Union (27 Sep 2024 4:50 PM) Removed sampling, as this is covered by 144 and 145.
141	To ensure that the phytosanitary import requirements of the importing country are met, sampling and inspection may be conducted at various points within a systems approach.	P	<i>Category : SUBSTANTIVE</i> (123) EPPO (13 Sep 2024 6:36 PM) Removed sampling, as this is covered by 144 and 145.
142	Chemical treatment <u>treatment</u> (section 2.2 of this standard)	P	<i>Category : EDITORIAL</i> (265) European Union (27 Sep 2024 4:53 PM) For consistency with the rest of the table.
142	Chemical treatment	C	<i>Category : EDITORIAL</i> (264) European Union (27 Sep 2024 4:51 PM) "Chemical treatment" cannot stay in between "Pre-dispatch sampling and inspection" and "Sampling and laboratory testing" as currently, because this breaks the logic of reading the table. It could be moved for example after paragraph 132 (Water application).
142	Chemical treatment	C	<i>Category : EDITORIAL</i> (125) EPPO (13 Sep 2024 6:36 PM)

			"Chemical treatment" cannot stay in between "Pre-dispatch sampling and inspection" and "Sampling and laboratory testing" as currently, because this breaks the logic of reading the table. It could be moved for example after paragraph 132 (Water application).
142	Chemical treatment <u>treatment (section 2.2 of this standard)</u>	P	<i>Category : EDITORIAL</i> (124) EPPO (13 Sep 2024 6:36 PM) For consistency with the rest of the table.
143	To prevent pests from infesting processed wood commodities, chemical treatments <u>including pest-baits</u> may be applied.	P	<i>Category : TECHNICAL</i> (197) PPPO (24 Sep 2024 5:58 PM) To ensure an example for pest baits (specially for insects).
143	To prevent pests from infesting processed wood commodities, chemical treatments may be applied.	P	<i>Category : TECHNICAL</i> (166) Canada (18 Sep 2024 3:34 PM) Processed wood based on ISPM 5 definition should not be susceptible to infestation. Do we mean to say sawn wood/treated wood. Terminology needs to be clear otherwise this may insinuate that processed wood can be infested or re-infested post processing/treatment.
144	Sampling <u>and for</u> laboratory testing <u>and pest identification</u> (section 2.4 of this standard)	P	<i>Category : TECHNICAL</i> (266) European Union (27 Sep 2024 4:54 PM) 1) More precise wording. 2) "testing and pest identification" is the wording used in the draft annex to ISPM 46.
144	Sampling <u>and for</u> laboratory testing <u>and pest identification</u> (section 2.4 of this standard)	P	<i>Category : TECHNICAL</i> (126) EPPO (13 Sep 2024 6:36 PM) 1) More precise wording. 2) "testing and pest identification" is the wording used in the draft annex to ISPM 46.
146	Transport	C	<i>Category : SUBSTANTIVE</i> (267) European Union (27 Sep 2024 4:55 PM) See the related European Union comments we made about dispatch on paragraphs 134 and 135.
146	Transport	C	<i>Category : SUBSTANTIVE</i> (127) EPPO (13 Sep 2024 6:36 PM) See the related EPPO comments we made about dispatch on paragraphs 134 and 135.
147	<u>-Planned transport method and usage</u> Protection during transport	P	<i>Category : SUBSTANTIVE</i> (63) APPPC (9 Sep 2024 12:22 PM)
149	Phytosanitary treatment <u>Treatment</u> during transport	P	<i>Category : EDITORIAL</i> (269) European Union (27 Sep 2024 5:00 PM) For consistency with paragraph 86.

149	Phytosanitary treatment <u>Treatment</u> during transport	P	Category : EDITORIAL (128) EPPO (13 Sep 2024 6:36 PM) For consistency with paragraph 86.
150	Wood commodities may be treated in either containers or ship holds while in transit <u>during transport</u> . The type of treatment that is appropriate depends on the type of container required or available, the expertise needed, shipping laws (including occupational and health requirements), the wood commodities being transported and the importing country's <u>requirements</u> requirements of the importing country .	P	Category : EDITORIAL (270) European Union (27 Sep 2024 5:03 PM) More appropriate term and consistency with paragraph 146. Easier to read and written in this way in paragraph 164.
150	Wood commodities may be treated in either containers or ship holds while in transit <u>during transport</u> . The type of treatment that is appropriate depends on the type of container required or available, the expertise needed, shipping laws (including occupational and health requirements), the wood commodities being transported and the importing country's <u>requirements</u> requirements of the importing country .	P	Category : EDITORIAL (129) EPPO (13 Sep 2024 6:36 PM) More appropriate term and consistency with paragraph 146. Easier to read and written in this way in paragraph 164.
152	The choice of transport route can affect pest risk. Pest risk may be reduced by choosing a route based on the known distribution and phenology of pests associated with the wood commodities being transported and the weather and climatic conditions during transit <u>transport</u> .	P	Category : TECHNICAL (271) European Union (27 Sep 2024 5:05 PM) More appropriate term and consistency with paragraph 146.
152	The choice of transport route can affect pest risk. Pest risk may be reduced by choosing a route based on the known distribution and phenology of pests associated with the wood commodities being transported and the weather and climatic conditions during transit <u>transport</u> .	P	Category : TECHNICAL (130) EPPO (13 Sep 2024 6:36 PM) More appropriate term and consistency with paragraph 146.
152	The choice of transport route can affect pest risk. Pest risk may be reduced by choosing a route based on the known distribution and phenology of pests associated with the wood commodities being transported and the weather and climatic conditions during transit <u>transport</u> .	P	Category : TECHNICAL (50) COSAVE (26 Aug 2024 5:46 PM) For consistency
152	The choice of transport route can affect pest risk. Pest risk may be reduced by choosing a route based on the known distribution and phenology of pests associated with the wood commodities being transported and the weather and climatic conditions during transit <u>transport</u> .	P	Category : TECHNICAL (23) Uruguay (18 Aug 2024 2:29 AM) For consistency
154	Conveyances may should be cleaned before loading or after unloading to reduce infestation of wood commodities by pests from previous cargoes.	P	Category : SUBSTANTIVE (326) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM)
154	Conveyances may be cleaned <u>Cleaning of conveyances</u> before loading or after unloading to reduce <u>reduces</u> infestation of wood commodities by pests from previous cargoes.	P	Category : TECHNICAL (272) European Union (27 Sep 2024 5:08 PM) It is sufficient to describe the nature of the possible measure and its possible use. No need to say that it may or should be included in a systems approach.
154	Conveyances may be cleaned <u>Cleaning of conveyances</u> before loading or after unloading to reduce infestation of wood commodities by pests from previous cargoes.	P	Category : TECHNICAL (131) EPPO (13 Sep 2024 6:36 PM)

			It is sufficient to describe the nature of the possible measure and its possible use. No need to say that it may or should be included in a systems approach.
155	Notes: NPPO, national plant protection organization.	P	Category : TECHNICAL (51) COSAVE (26 Aug 2024 5:47 PM) For consistency
155	Notes: NPPO, national plant protection organization.	P	Category : TECHNICAL (24) Uruguay (18 Aug 2024 2:30 AM) Delete terms used are in ISPM 5
156	ISPMs are available at https://www.ippc.int/core-activities/standards-setting/ispm5.	P	Category : TECHNICAL (52) COSAVE (26 Aug 2024 5:48 PM) Delete to avoid duplication with Section "References" in the core text
156	ISPMs are available at https://www.ippc.int/core-activities/standards-setting/ispm5.	P	Category : TECHNICAL (25) Uruguay (18 Aug 2024 2:31 AM) Delete to avoid repetition with section references of ISPM 39
157	When applicable and feasible, some of the practices, procedures or regulatory actions described in Table 1 may be applied as post-import measures. In addition, practices, procedures or regulatory actions that are specific to the post-import part of the production chain may be employed as components of the a systems approach, if agreed <u>upon</u> by the NPPO of the importing country and the NPPO of the exporting country (Table 2).	P	Category : EDITORIAL (167) Canada (18 Sep 2024 3:35 PM)
158	Table 2. Examples of post-import practices, procedures and regulatory actions that may be used in a wood-commodities systems approach	C	Category : SUBSTANTIVE (198) PPPO (24 Sep 2024 5:58 PM) Consider changing the use of the term 'regulatory actions'. Recommend use of language more aligned with ISPM 5.
158	Table 2. Examples of post-import practices, procedures and regulatory actions that may be used in a wood-commodities systems approach <u>approach for wood commodities</u>	P	Category : EDITORIAL (168) Canada (18 Sep 2024 3:36 PM)
160	A systems approach may include provisions for wood-commodity storage that are designed to prevent pest escape <u>escape from storage areas</u> , infestation, and contamination of storage areas <u>contamination</u> .	P	Category : EDITORIAL (273) European Union (27 Sep 2024 5:10 PM) unnecessary coma Removal of "of storage areas" as it is redundant. 'from' should be added (= escape from storage areas) and the comma can be deleted after "infestation".
160	A systems approach may include provisions for wood-commodity storage that are designed to prevent pest escape <u>escape from storage areas</u> , infestation, and contamination of storage areas <u>contamination</u>	P	Category : EDITORIAL (132) EPPO (13 Sep 2024 6:36 PM) unnecessary coma

			Removal of "of storage areas" as it is redundant. 'from' should be added (= escape from storage areas) and the comma can be deleted after "infestation".
162	Treatment on <u>such as heat treatment or fumigation on</u> arrival may be included as part of a systems approach.	P	Category : EDITORIAL (178) Canada (19 Sep 2024 8:17 PM) Provide examples of treatment
164	Inspection on arrival <u>may-should</u> be used to verify that wood commodities meet the phytosanitary import requirements of the importing country. Inspections should be conducted in accordance with ISPM 23 (<i>Guidelines for inspection</i>).	P	Category : SUBSTANTIVE (327) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:35 PM)
165	Limiting <u>intended use time frame before processing</u> (section 3 of this standard)	P	Category : TECHNICAL (274) European Union (27 Sep 2024 5:14 PM) Suggestion of a specific title which corresponds to a different measure.
165	Limiting intended use (section 3 of this standard) <u>Limiting time frame before processing</u>	P	Category : TECHNICAL (133) EPPO (13 Sep 2024 6:36 PM) Suggestion of a specific title for paragraph 167 which corresponds to a different measure.
166	The intended uses of the wood commodities being imported may be stipulated in a systems approach. The systems approach may be set up for a particular intended use, such as wood chipping (as wood chipping effectively reduces potential infestation by wood borers), and this intended use may <u>also</u> determine the measures to be applied along the production chain and result in a different pest risk compared to other intended uses.	P	Category : EDITORIAL (300) Eswatini (30 Sep 2024 8:31 AM)
167	The wood commodity may be suitable for storage and processing within a certain time frame on arrival via an NPPO-approved system for a particular pest (e.g. chipping and pelleting of wood on arrival)-. <u>This is to limit the likelihood of pest entry or spread.</u>	P	Category : SUBSTANTIVE (310) Australia (30 Sep 2024 2:54 PM) Added to clarify the purpose of the practice.
170	3. Designing a wood-commodities systems approach	C	Category : SUBSTANTIVE (275) European Union (27 Sep 2024 5:16 PM) The difference between sections 1 (Developing a wood-commodity systems approach) and 3 (Designing a wood-commodity systems approach) could perhaps be made clearer.
170	3. Designing a wood-commodities systems approach<u>approach for wood commodities</u>	P	Category : EDITORIAL (169) Canada (18 Sep 2024 3:37 PM)
170	3. Designing a wood-commodities systems approach	C	Category : SUBSTANTIVE (134) EPPO (13 Sep 2024 6:36 PM) The difference between sections 1 (Developing a wood-commodity systems approach) and 3 (Designing a wood-commodity systems approach) could perhaps be made clearer.

171	When designing a systems approach, the NPPO of the exporting country should select appropriate practices, procedures and regulatory actions, for example from those described in Table 1 and Table 2, and propose these to the NPPO of the importing country along with an explanation of how these practices, procedures and regulatory actions would reduce the pest risk associated with wood commodities to meet the phytosanitary import requirements of the importing country. The NPPO of the importing country should evaluate whether the proposed measures meet their <u>its</u> phytosanitary import requirements. The NPPO of the importing country may request scientific evidence from the NPPO of the exporting country regarding the effectiveness and feasibility of the proposed measures.	P	<p>Category : <i>EDITORIAL</i></p> <p>(311) Australia (30 Sep 2024 2:55 PM)</p> <p>Revised with more appropriate language ('their' anthropomorphises the NPPO)</p>
171	When designing a systems approach, the NPPO of the exporting country should select appropriate practices, procedures and regulatory actions, for example from those described in Table 1 and Table 2, and propose these to the NPPO of the importing country along with an explanation of how these practices, procedures and regulatory actions would reduce the pest risk associated with wood commodities to meet the phytosanitary import requirements of the importing country. The NPPO of the importing country should evaluate whether the proposed measures meet their phytosanitary import requirements. The NPPO of the importing country may request scientific evidence from the NPPO of the exporting country regarding the effectiveness and feasibility of the proposed measures.	C	<p>Category : <i>SUBSTANTIVE</i></p> <p>(276) European Union (27 Sep 2024 5:17 PM)</p> <p>We believe that the last but one sentence is not fully consistent with ISPM 14 (and ISPM 24), in particular as regards the wording "should evaluate". It would be better to simply refer to ISPM 14 (and ISPM 24).</p>
171	When designing a systems approach, the NPPO of the exporting country should select appropriate practices, procedures and regulatory actions, for example from those described in Table 1 and Table 2, and propose these to the NPPO of the importing country along with an explanation of how these practices, procedures and regulatory actions would reduce the pest risk associated with wood commodities to meet the phytosanitary import requirements of the importing country. The NPPO of the importing country should evaluate whether the proposed measures meet their phytosanitary import requirements. The NPPO of the importing country may request scientific evidence from the NPPO of the exporting country regarding the effectiveness and feasibility of the proposed measures.	C	<p>Category : <i>SUBSTANTIVE</i></p> <p>(135) EPPO (13 Sep 2024 6:36 PM)</p> <p>We believe that the last but one sentence is not fully consistent with ISPM 14 (and ISPM 24), in particular as regards the wording "should evaluate". It would be better to simply refer to ISPM 14 (and ISPM 24).</p>
172	Consideration of best practices and standards used by industry to produce wood commodities may promote the development of the systems approach in a way that is feasible for, and acceptable to, both the exporting and the importing country. <u>Industry has experience and an in-depth understanding of the wood production</u>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p>(277) European Union (27 Sep 2024 5:18 PM)</p> <p>We suggest to delete the first part of the second sentence as not relevant for an ISPM.</p>

	chain, and NPPOs are encouraged to engage industry in the early stages of the development of the systems approach.		
172	Consideration of best practices and standards used by industry to produce wood commodities may promote the development of the systems approach in a way that is feasible for, and acceptable to, both the exporting and the importing country. Industry has experience and an in-depth understanding of the wood production chain, and NPPOs are encouraged to engage industry in the early stages of the development of the systems approach.	P	<i>Category : SUBSTANTIVE</i> (136) EPPO (13 Sep 2024 6:36 PM) We suggest to delete the first part of the second sentence as not relevant for an ISPM.
173	4. Responsibilities for implementation of a wood-commodities systems approach <u>approach for wood-commodities</u>	P	<i>Category : EDITORIAL</i> (170) Canada (18 Sep 2024 3:37 PM)
174	4.1 Responsibilities of NPPOs	C	<i>Category : SUBSTANTIVE</i> (278) European Union (27 Sep 2024 5:19 PM) Most of the bullet points are covered in ISPM14, but para 175 says they are in addition to ISPM14. Is it necessary to have all the bullet points? ISPM 14 should be checked in order to keep only the additional bullets.
174	4.1 Responsibilities of NPPOs	C	<i>Category : SUBSTANTIVE</i> (137) EPPO (13 Sep 2024 6:36 PM) Most of the bullet points are covered in ISPM14, but para 175 says they are in addition to ISPM14. Is it necessary to have all the bullet points? ISPM 14 should be checked in order to keep only the additional bullets.
175	The responsibilities of the NPPOs participating in a systems approach are described in ISPM 14. In addition, for a wood-commodities systems approach <u>approach</u> , the responsibilities should include, but are not limited to, the following:	P	<i>Category : EDITORIAL</i> (184) Japan (20 Sep 2024 5:58 AM)
175	The responsibilities of the NPPOs participating in a systems approach are described in ISPM 14. In addition, for in a wood-commodities systems approach <u>for wood-commodities</u> , the responsibilities should include, but are not limited to, the following:	P	<i>Category : EDITORIAL</i> (171) Canada (18 Sep 2024 3:51 PM)
175	The responsibilities of the NPPOs participating in a systems approach are described in ISPM 14. In addition, for a wood-commodities systems approach the responsibilities should include, but are not limited to, the following: <u>- Prior to issuing the phytosanitary certificate, the NPPO of the exporting country should verify compliance with the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the origin of the timber.</u>	P	<i>Category : TECHNICAL</i> (17) Colombia (9 Aug 2024 11:31 PM) Within the responsibilities of the NPPO it is proposed to include a paragraph noting the importance of certificates being issued in accordance with the phytosanitary import requirements of the importing country.
176	communicating the phytosanitary import requirements of the importing country	P	<i>Category : EDITORIAL</i>

	and the requirements, specifically, of the wood-commodities systems approach <u>approach wood-commodities</u> , to all participating entities;		(172) Canada (18 Sep 2024 3:51 PM)
182	ensuring that the systems approach is audited in accordance with ISPM 47 (<i>Audit in the phytosanitary context</i>). <u>[NEW POINT] ensuring that other relevant conventions (e.g. CITES) are taken into consideration.</u>	P	<i>Category : SUBSTANTIVE</i> (199) PPPO (24 Sep 2024 5:58 PM) Considering other conventions related to the trade of wood.
183	4.2 Responsibilities of entities participating in the systems approach	C	<i>Category : TECHNICAL</i> (279) European Union (27 Sep 2024 5:20 PM) Should there be a reference to quality systems established by the industry as proposed for seeds?
183	4.2 Responsibilities of entities participating in the systems approach	C	<i>Category : TECHNICAL</i> (138) EPPO (13 Sep 2024 6:36 PM) Should there be a reference to quality systems established by the industry as proposed for seeds?
186	To facilitate the successful implementation and effective communication of a wood-commodities systems approach <u>approach for wood-commodities</u> , documents should include a description of the NPPOs' requirements for the systems approach, the procedures for implementing the systems approach and the records of its implementation.	P	<i>Category : EDITORIAL</i> (173) Canada (18 Sep 2024 3:53 PM)
188	National plant protection organizations The NPPOs should produce a description of the requirements for the systems approach. This description should cover aspects including, but not limited to:	P	<i>Category : EDITORIAL</i> (280) European Union (27 Sep 2024 5:22 PM) Editorial
188	National plant protection organizations The NPPOs should produce a description of the requirements for the systems approach. This description should cover aspects including, but not limited to:	P	<i>Category : EDITORIAL</i> (139) EPPO (13 Sep 2024 6:36 PM) Editorial
192	<u>traceability</u> .	C	<i>Category : TECHNICAL</i> (7) United States of America (26 Jul 2024 4:31 PM) Suggest reconciling the requirements for traceability in one place - currently is covered under Section 5.1. and Section 6.
193	5.2 Implementation procedures documented by participating entities and NPPOs	C	<i>Category : SUBSTANTIVE</i> (200) PPPO (24 Sep 2024 5:58 PM) It is unclear whether this section is referring to the systems approach and the entities involved or the authorisation of entities by participating NPPOs. As systems approach is covered in ISPM 14 and authorisation is covered in ISPM 45, we consider this section is not required and should be deleted.
198	procedures associated with maintaining records of the measures applied in the	P	<i>Category : SUBSTANTIVE</i>

	systems approach and <u>if necessary</u> , ensuring traceability <u>traceability for specific control points</u> ; and		(185) Japan (20 Sep 2024 6:07 AM) Considering the long production cycle of wood, it may be difficult to ensure traceability at all critical control point. (e.g. information when planting).
201	National plant protection organizations and participating entities should record the measures that have been applied in implementing the systems approach and should retain these records <u>for auditing purposes</u> to demonstrate the implementation of the systems approach. The retention time of these records should be agreed between the NPPO of the importing country and the NPPO of the exporting country.	P	<i>Category : SUBSTANTIVE</i> (312) Australia (30 Sep 2024 2:57 PM) Example of why records should be kept.
201	National plant protection organizations <u>The NPPOs</u> and participating entities should record the measures that have been applied in implementing the systems approach and should retain these records to demonstrate the implementation of the systems approach. The retention time of these records should be agreed between the NPPO of the importing country and the NPPO of the exporting country.	P	<i>Category : EDITORIAL</i> (281) European Union (27 Sep 2024 5:23 PM) Editorial
201	National plant protection organizations and participating entities should record the measures that have been applied in implementing the systems approach and should retain these records to demonstrate the implementation of the systems approach. The retention time of these records should be agreed between <u>upon by</u> the NPPO of the importing country and the NPPO of the exporting country.	P	<i>Category : EDITORIAL</i> (174) Canada (18 Sep 2024 3:54 PM)
201	National plant protection organizations <u>The NPPOs</u> and participating entities should record the measures that have been applied in implementing the systems approach and should retain these records to demonstrate the implementation of the systems approach. The retention time of these records should be agreed between the NPPO of the importing country and the NPPO of the exporting country.	P	<i>Category : EDITORIAL</i> (140) EPPO (13 Sep 2024 6:36 PM) Editorial
203	Participating entities in a systems approach should ensure that adequate records are retained to allow traceability in relation to all critical control points along the wood-commodities production chain. These records should be retained in the exporting country for those measures that are applied pre-export or during transit <u>transport</u> , and in the importing country for the measures undertaken <u>applied</u> in the importing country.	P	<i>Category : EDITORIAL</i> (282) European Union (27 Sep 2024 5:23 PM) More appropriate term and consistency with paragraph 146 in Table 1. Better wording.
203	Participating entities in a systems approach should ensure that adequate records are retained to allow traceability in relation to all critical control points along the wood-commodities production chain. These records should be retained in the exporting country for those measures that are applied pre-export or during transit,	C	<i>Category : SUBSTANTIVE</i> (201) PPPO (24 Sep 2024 5:58 PM) Potential implementation issue - given the longevity of the production cycle (decades) traceability and record keeping may prove difficult to

	and in the importing country for the measures undertaken in the importing country.		present evidence at time of harvest.
203	Participating entities in a systems approach should ensure that adequate records are retained to allow traceability in relation to all critical control points along the wood-commodities production chain. These records should be retained in the exporting country for those measures that are applied pre-export or during transit <u>transport</u> , and in the importing country for the measures undertaken-applied in the importing country.	P	Category : EDITORIAL (141) EPPO (13 Sep 2024 6:36 PM) More appropriate term and consistency with paragraph 146 in Table 1. Better wording.
203	Participating entities in a systems approach should ensure that adequate records are retained to allow traceability in relation to all critical control points along the wood-commodities production chain. These records should be retained in the exporting country for those measures that are applied pre-export or during transit, and in the importing country <u>country</u> , for the measures undertaken in the importing country <u>undertaken</u> .	P	Category : EDITORIAL (54) Philippines (4 Sep 2024 2:05 AM)
204	7. Evaluating the effectiveness of a wood-commodities-systems approach <u>for wood-commodities</u> and its component measures	P	Category : EDITORIAL (175) Canada (18 Sep 2024 3:55 PM)
205	Guidance on evaluation methods can be found in ISPM 14.	C	Category : SUBSTANTIVE (202) PPPO (24 Sep 2024 5:58 PM) Potential implementation issue - if ISPM 14 is not revised, or further guidance is not provided, evaluation methods of each component of a systems approach is difficult.
208	NAPPO (North American Plant Protection Organization). 2018. Use of systems approaches to manage pest risks associated with the movement of forest products. Regional Standard for Phytosanitary Measures (RSPM) No. 41. Raleigh, USA, NAPPO Secretariat. 54 pp. https://nappo.org/application/files/8715/8352/3001/RSPM_41_10_22_18_e.pdf	P	Category : EDITORIAL (283) European Union (27 Sep 2024 5:25 PM) Remove reference, as it is no longer cited in the annex.
208	NAPPO (North American Plant Protection Organization). 2018. Use of systems approaches to manage pest risks associated with the movement of forest products. Regional Standard for Phytosanitary Measures (RSPM) No. 41. Raleigh, USA, NAPPO Secretariat. 54 pp. https://nappo.org/application/files/8715/8352/3001/RSPM_41_10_22_18_e.pdf	P	Category : EDITORIAL (142) EPPO (13 Sep 2024 6:36 PM) Remove reference, as it is no longer cited in the annex.
210	APPENDIX 1 TO ANNEX [X]: Major wood pests grouped according to where they live and reproduce	C	Category : SUBSTANTIVE (203) PPPO (24 Sep 2024 5:58 PM) Consider the inclusion of ants in the relevant area of this appendix (e.g.

			wasmanilla auropunctata).
210	APPENDIX 1 TO ANNEX [X]: Major wood pests grouped according to where they live and reproduce	C	<i>Category : TECHNICAL</i> (33) South Africa (20 Aug 2024 1:57 PM) Proposal to include mites in all categories because mites are not localized to one part of wood.
211	Pests associated with trees can be grouped according to the plant tissues they use to live and reproduce. They include pests that live and reproduce in the following locations: on, in or just under the surface bark; in wood tissue under the bark; and in foliage and twigs.	P	<i>Category : EDITORIAL</i> (284) European Union (27 Sep 2024 5:26 PM) In paragraph 212, just the word 'bark' is used. It might be good to use 'bark' here as well to make understanding and translation easier (in-growing bark can be ignored in this case).
211	Pests associated with trees can be grouped according to the plant tissues they use to live and reproduce. They include pests that live and reproduce in the following locations: on, in or just under the surface bark; in wood tissue under the bark; and in foliage and twigs.	P	<i>Category : EDITORIAL</i> (143) EPPO (13 Sep 2024 6:36 PM) In paragraph 212, just the word 'bark' is used. It might be good to use 'bark' here as well to make understanding and translation easier (in-growing bark can be ignored in this case).
214	Bark beetles (Coleoptera: Curculionidae: Scolytinae, except Corthylini, Xyleborini and Xyloterini) – The members of this highly diverse subfamily spend most of their life cycle under the bark of their host trees, foraging on the inner bark and phloem (phloem).	P	<i>Category : TECHNICAL</i> (285) European Union (27 Sep 2024 5:27 PM) Please see https://www.fs.usda.gov/learn/trees/anatomy-of-tree
214	Bark beetles (Coleoptera: Curculionidae: Scolytinae, except Corthylini, Xyleborini and Xyloterini) – The members of this highly diverse subfamily spend most of their life cycle under the bark of their host trees, foraging on the inner bark and phloem (phloem).	P	<i>Category : TECHNICAL</i> (144) EPPO (13 Sep 2024 6:36 PM) Please see https://www.fs.usda.gov/learn/trees/anatomy-of-tree
216	Fungi and oomycetesoomycetes (e.g. <i>Phytophthora</i> species) – Many fungal pests, including stem rusts and canker fungi, grow and sporulate in close association with bark and phloem tissues. These pests may be present on the outer surfaces of some wood commodities.	P	<i>Category : EDITORIAL</i> (286) European Union (27 Sep 2024 5:29 PM) Typo: A space is missing after 'oomycetes'.
216	Fungi and oomycetesoomycetes (e.g. <i>Phytophthora</i> species) – Many fungal pests, including stem rusts and canker fungi, grow and sporulate in close association with bark and phloem tissues. These pests may be present on the outer surfaces of some wood commodities.	P	<i>Category : EDITORIAL</i> (145) EPPO (13 Sep 2024 6:36 PM) Typo: A space is missing after 'oomycetes'.
220	Ambrosia beetles (Coleoptera: Curculionidae: Scolytinae (Corthylini, Xyleborini, Xyloterini) and Platypodinae) – These beetles may be found in the inner bark, phloem-bark (phloem) and xylem.	P	<i>Category : TECHNICAL</i> (287) European Union (27 Sep 2024 5:31 PM) Please see the comment made on paragraph 214.
220	Ambrosia beetles (Coleoptera: Curculionidae: Scolytinae (Corthylini, Xyleborini,	P	<i>Category : TECHNICAL</i> (146) EPPO (13 Sep 2024 6:36 PM)

	Xyloterini) and Platypodinae) – These beetles may be found in the inner bark, phloem-bark (phloem) and xylem.		Please see the comment made on paragraph 214.
222	Fungi – Many fungal species of fungi inhabit the woody portion (xylem) of tree stems. The success, location and extent of fungal colonization is largely governed by the nutritional requirements of the fungi, the physical characteristics of the wood (chemical composition composition and pH , cell structure, etc.), the wood moisture, the temperature and the presence of competing organisms. Decay fungi and vascular wilt fungi may be present throughout the xylem-wood or, depending on the species, may be restricted to the sapwood (xylem) or heartwood. Most canker and rust infections of stem-trunk wood are restricted to the outer several centimetres centimeters of wood.	P	Category : EDITORIAL (288) European Union (27 Sep 2024 5:35 PM) More precise wording, because xylem = sapwood. 'Trunks' seems to be a better term instead of 'stems'. Precision given
222	Fungi – Many fungal species of fungi inhabit the woody portion (xylem) of tree stems. The success, location and extent of fungal colonization is largely governed by the nutritional requirements of the fungi, the physical characteristics of the wood (chemical composition composition and pH , cell structure, etc.), the wood moisture, the temperature and the presence of competing organisms. Decay fungi and vascular wilt fungi may be present throughout the xylem-wood or, depending on the species, may be restricted to the sapwood (xylem) or heartwood. Most canker and rust infections of stem-trunk wood are restricted to the outer several centimetres of wood.	P	Category : EDITORIAL (147) EPPO (13 Sep 2024 6:36 PM) More precise wording, because xylem = sapwood. 'Trunks' seems to be a better term instead of 'stems'. Precision given
223	Nematodes – Pathogenic nematodes (Nematoda: e.g. <i>Bursaphelenchus cocophilus</i> (Cobb, 1919) Baujard, 1989, <i>Bursaphelenchus xylophilus</i> (Steiner & Bühner, 1934) Nickle, 1970) live primarily in the sapwood, specifically in the xylem sapwood (xylem).	P	Category : TECHNICAL (289) European Union (27 Sep 2024 5:36 PM) More precise wording, because xylem = sapwood.
223	Nematodes – Pathogenic nematodes (Nematoda: e.g. <i>Bursaphelenchus cocophilus</i> (Cobb, 1919) Baujard, 1989, <i>Bursaphelenchus xylophilus</i> (Steiner & Bühner, 1934) Nickle, 1970) live primarily in the sapwood, specifically in the xylem sapwood (xylem).	P	Category : TECHNICAL (148) EPPO (13 Sep 2024 6:36 PM) More precise wording, because xylem = sapwood.
223	Nematodes – Pathogenic-Parasitic nematodes (Nematoda: e.g. <i>Bursaphelenchus cocophilus</i> (Cobb, 1919) Baujard, 1989, <i>Bursaphelenchus xylophilus</i> (Steiner & Bühner, 1934) Nickle, 1970) live primarily in the sapwood, specifically in the xylem.	P	Category : EDITORIAL (58) Philippines (4 Sep 2024 2:45 AM)

226	Pests that live in and on foliage may include, but are not limited to, adelgids, ants , aphids, flies , moths, nematodes, scale insects and wasps.	P	<p><i>Category : TECHNICAL</i></p> <p>(290) European Union (27 Sep 2024 5:38 PM)</p> <p>As these are only examples, it is suggested to keep only the most important wood pest groups.</p>
226	Pests that live in and on foliage may include, but are not limited to, adelgids, ants , aphids, flies , moths, nematodes, scale insects and wasps.	P	<p><i>Category : TECHNICAL</i></p> <p>(149) EPPO (13 Sep 2024 6:36 PM)</p> <p>As these are only examples, it is suggested to keep only the most important wood pest groups.</p>
228	Spores of fungi and fungus-like <u>fungus-like</u> organisms may be present on outer surfaces, as on all other forest commodities.	P	<p><i>Category : EDITORIAL</i></p> <p>(55) Philippines (4 Sep 2024 2:06 AM)</p>
229	Potential implementation issues	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(291) European Union (27 Sep 2024 5:40 PM)</p> <p>With reference to paragraph 107: The internal heat generated in piles of wood chips can be used to reduce levels of infestation. However, due to the irregular distribution of heat through the pile, it requires careful management and monitoring before it can be considered an effective treatment. It would be good if guidance material could be gathered or developed.</p>
229	Potential implementation issues	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(64) APPPC (9 Sep 2024 12:22 PM)</p> <p>Guidance on record keeping and traceability is specifically needed for the implementation of the standard. Wood is a unique commodity in that it can have a very long production cycle. Therefore traceability for the application of measures applied during production for a systems approach may occur decades before export and the exporter may be a different entity from the producer.</p>
230	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.	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(150) EPPO (13 Sep 2024 6:36 PM)</p> <p>With reference to paragraph 107: The internal heat generated in piles of wood chips can be used to reduce levels of infestation. However, due to the irregular distribution of heat through the pile, it requires careful management and monitoring before it can be considered an effective treatment. It would be good if guidance material could be gathered or developed.</p>