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	منظمة الأغذية والزراعة للأمم المتحدة	联合国 粮食及 农业组织	Food and Agriculture Organization of the United Nations	Organisation des Nations Unies pour l'alimentation et l'agriculture	Продовольственная и сельскохозяйственная организация Объединенных Наций	Organización de las Naciones Unidas para la Alimentación y la Agricultura
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COMMISSION ON PHYTOSANITARY MEASURES

Seventh Session
Rome, 19 - 23 March 2012
COSAVE Interventions on Several Agenda Points
Prepared by COSAVE
Agenda item 8.1.5
Agenda item 8.1.6
Agenda item 9.1

General Comments on List of Topics (CPM 2012/05Rev2)

We propose the following changes to the list of Table 1:

- 1) Topics listed below could be added as annexes to ISPM 11, considering the particular traits of these products in assessment and management of the risk:
 - International movement of grain (line 2)
 - International movement of cut flowers and foliage (line 29)
- 2) Incorporate the topic *Wood Products and handicrafts made from raw Wood* (line 15) to the draft *Management of Phytosanitary Risks in the international movement of wood* (line 6)
- 3) We agree with removing the 10 proposed topics. Besides we are proposing to remove the following topics: Surveillance for citrus canker (line 30) and Import of Germplasm (line 14). Regarding the first topic, because it refers to a subject that could be incorporated into the topic System approach for management of citrus canker (line 31). The second topic, because in relation to Import of germplasm, no progress has been done and it is also an issue that can be considered incorporated in developing standards.

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We do not agree to develop manuals for removed topics because:

- There is no need to have any document on a topic for which deletion is decided
- Subjects without agreement between parties
- Subjects covered in other standards
- Limited resources.

General comments on recommendations for improving the IPPC standard setting process (CPM 2012/11)

The approval process for diagnostic protocols is not clear in relation to modality for submission of member consultation (Recommendation 9A).

We are not agreeing on that proposal, adoption and prioritization of topics are linked to the funding source (Recommendation 14).

We are not agreeing with the regional coordinator's role for the Standard Committee, neither to reduce the number of its members (Recommendations 19 and 21).

The following expression should be clarified: "There should be a single IPPC standard setting process. Specific technical standards (e.g. DPs, PTs) should follow this process, but the procedures currently used in the "special process" (such as electronic decision-making) should continue to apply", in relation to fast track and the single procedure proposed specially to the PT (Recommendation 8).

General comments on Strategic Framework 2012-2019 (CPM 2012/08)

Some terms are not commonly used in the IPPC framework such as "transboundary movement" (para 1), "injurious plant pests" (para 1 and 2), "invasive plant pests" (para 11), etc.. We consider that a document relating to the strategic framework of the IPPC should include proper phytosanitary terms.

Point F. Regulatory policy challenges (paragraph 49). The expression "voluntary certification schemes" is used unknowing the meaning of the term in the context of public-private interaction. This expression should be removed.

Paragraph 51 states that the NPPO are changing the methylbromide treatment as phytosanitary measure to "combinations of alternative pest management measures and systems approaches." Thus, it is understood that the meaning of System Approach is skewed, as it should say is that NPPO are changing the use of methyl bromide to alternative phytosanitary measures like systems approaches.

Paragraph 72. Some terms as "knowledge management system" that the SPTA agreed to remove, are still in use.

In the Conclusion (Section VIII, from paragraph 134) where key themes over the next 8 years are mentioned, it is proposed to extend actions to other different pests than regulated pests, leading to technical cooperation among countries regarding pests with no impact on international trade, but of high national and regional economic impact (e.g., locusts).